

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Friday, December 21, 2018 2:55 PM  
**To:** Wagner, Greg (DPH); Cretan, Jeff (MYR)  
**Subject:** FW: Memo to SF Chronicle editors

FYI

**From:** Gray, Michael [mailto:MGray@sfchronicle.com]  
**Sent:** Friday, December 21, 2018 2:28 PM  
**To:** Kagan, Rachael (DPH) <rachael.kagan@sfdph.org>; Reisman, Will (PUC) <WReisman@sewater.org>  
**Cc:** Fagone, Jason <Jason.Fagone@sfchronicle.com>; Dizikes, Cynthia <CDizikes@sfchronicle.com>; Cooper, Audrey <ACooper@sfchronicle.com>  
**Subject:** Re: Memo to SF Chronicle editors

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Hello, Ms. Kagan:

We at The Chronicle are glad to know that your department is carefully reading our reporting on issues of health and safety at the former Hunters Point Naval Shipyard. As much as we appreciate the time it took to make notes on this most recent story, it is not clear from your comments whether you are seeking a correction of any kind, or just taking issue with certain aspects you don't agree with. If you can point to any errors of fact that require correcting, please let us know.

It was somewhat surprising to receive your list of objections to this story when previous stories that have questioned the efficacy of tests carried out by SFDPH and other agencies in and around Building 606 and other areas (Parcel A, for instance) received no such response. What you refer to as "opinion" and "omission" is the result of thorough reporting that we believe shows reason to question the official line of the Health Department about the health and safety of city employees working on a Superfund site. We also feel that our reporting has helped surface important, possibly crucial, facts about the situation there than have been promulgated by your department's primary watchdog and spokesperson on the cleanup and development project.

We appreciate the time you have spent to answer our questions for this story and others. We anticipate that there will be many more in the future as we continue to report on the shipyard. As your department has a key role in the shipyard, we wish to have a productive working relationship with you. We would be happy to have you come in to discuss your department's work and perspective on the Hunters Point project with our editors and reporters.

Michael Gray  
Managing Editor  
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**From:** "Kagan, Rachael (DPH)" <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Date:** Friday, December 21, 2018 at 11:22 AM  
**To:** Audrey Cooper <[ACooper@sfchronicle.com](mailto:ACooper@sfchronicle.com)>, "Gray, Michael" <[MGray@sfchronicle.com](mailto:MGray@sfchronicle.com)>  
**Cc:** "Reisman, Will (PUC)" <[WReisman@sfgate.com](mailto:WReisman@sfgate.com)>, "Fagone, Jason" <[Jason.Fagone@sfchronicle.com](mailto:Jason.Fagone@sfchronicle.com)>, "Dizikes, Cynthia" <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Memo to SF Chronicle editors

Michael Gray and Audrey Cooper,

Please see attached memo and supporting document from San Francisco Department of Public Health and Public Utilities Commission.

Thank you,  
Rachael Kagan

Rachael Kagan  
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San Francisco Department of Public Health  
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San Francisco, CA 94102  
415 554-2507  
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MEMO

21 December 2018

To: Michael Gray, Managing Editor, San Francisco Chronicle

Audrey Cooper, Editor in Chief, San Francisco Chronicle

From: Rachael Kagan, Director of Communications, San Francisco Department of Public Health

Will Reisman, Press Secretary, San Francisco Public Utilities Commission

Cc: Jason Fagone, Cynthia Dizikes

Regarding: Coverage of Building 606 at the Hunters Point Shipyard

We are writing to bring to your attention our concerns about the quality and professionalism of reporting about Building 606 at the Hunters Point Shipyard.

The reporters Jason Fagone and Cynthia Dizikes seem determined to portray Building 606 as unsafe, and reject any information that does not tell that story. The Health Department, PUC and the Police Department have provided voluminous responses to Chronicle questions over many months of stories about B606, most of which do not appear in the coverage. This is unfair to readers, to the B606 employees and to the agencies involved.

Here is an annotated version of the most recent story, to point out these areas of omission, opinion or inaccuracy. Also attached are the answers DPH and PUC provided for this story.

San Francisco Chronicle

New questions about SF safety tests at Hunters Point shipyard building

Jason Fagone and Cynthia Dizikes Dec. 20, 2018 Updated: Dec. 20, 2018 8:46 a.m.

City employees who work at an unusual building deep inside a San Francisco Superfund site have been waiting for years to know if their surroundings are safe. But recent tests by the city health department won't provide much comfort.

The structure at the former Hunters Point Naval Shipyard, which has housed police employees since 1997 and contains the citywide crime lab, is known as Building 606. In July, after The Chronicle revealed significant health hazards there — and years of failed oversight by government agencies — the health department promised the roughly 40 remaining employees that it would test the building's air, soil and tap water for chemicals and radioactive substances known to exist elsewhere at the site.

Since then, however, one of the most crucial tests, a search for radioactivity inside the building and in surrounding soil, has been delayed. It is not scheduled to begin until at least mid-January.

Meanwhile, some tests that have been completed were minimal and poorly designed, independent experts say, raising the possibility that the people who work there are not safe.

**Commented [RK1]:** Inaccurate. The Building was transferred to the city by the Navy as suitable for lease many years ago, under a strict federal and state regulatory process. The DPH and SFPD have worked together ever since the SFPD started using the building to respond to employee concerns and conduct tests as needed.

**Commented [RK2]:** That is an opinion, not a fact, and it is not attributed.

**Commented [RK3]:** We have provided an update on the status of all of those tests to the Chronicle, and they have omitted mention of several including air and dust.

**Commented [RK4]:** That is an opinion, not a fact. There is no history of radiation connected to the building, so one might also argue that the other tests, of building conditions, are more crucial.

**Commented [RK5]:** It is fine to question the tests, of course. However, there is no explanation provided of how differing standards or interpretations might be applied, only questions. The story also provides no mention of the tests that are not being questioned, and there is no conclusion presented by anyone that the workers are not safe. This seems to be a decision by the reporters — that the workers are unsafe — and they are not including any information that does not support that narrative.

"I think we're really taking a risk with their lives," Police Commission member Petra DeJesus said at a Dec. 12 hearing that discussed the testing at Building 606. "I don't understand why we don't really put pressure on the mayor's office and expedite removing them."

One of the newly completed tests was performed on the building's tap water, and another checked a nearby pile of soil. The water-quality test discovered an elevated level of lead in one sample and did not detect many other potential contaminants.

Due to concerns about the water's safety — past test results discovered troubling levels of lead, petroleum byproducts and other contaminants in the tap water — the Police Department has been providing bottled water to building occupants for two decades.

A sample from the soil pile contained radioactive substances at levels below the Navy's cleanup targets at the former shipyard, but above the default safety goals for Superfund sites set by the U.S. Environmental Protection Agency.

The city's health and police departments both said the testing that has been done should reassure employees and that no workers need to be relocated.

In testimony to the Police Commission, Deputy Police Chief Robert Moser said he saw no test results that required "any immediate action" to protect people in the building. The Department of Public Health said in a statement that the tests to date have been adequate and are part of ongoing checks that will continue next year, in collaboration with the Police Department and other agencies.

"The testing of the building continues to affirm that there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup," said health department spokeswoman Rachael Kagan.

This argument is one that the city has been repeating for 20 years, assuring police employees that they shouldn't worry about working at the building. It's what employees were told even when a toxic waste dump 2,000 feet away caught on fire in 2000 and spewed smoke for days. And they heard it again when the Navy hauled thousands of truckloads of contaminated soil and dumped them next to the building in 2007, releasing potentially radioactive dust particles into the air.

Radioactivity has been the dominant concern at the site since dozens of radioactive ships were hauled back to the shipyard in 1946 after nuclear tests in the Pacific. The area also was the site of federal nuclear labs that further spread toxic elements throughout buildings and the soil.

When the city promised to do more testing this year, potential exposure to radioactivity was again a significant concern of the building's employees. The health department told occupants in July that it would perform a comprehensive search for radioactive hazards indoors and outdoors — in the air filters, in the crawl space beneath the building and in the soil and parking areas around it.

But five months later, that search has not begun — a delay that DeJesus found troubling.

"Why would we delay testing?" DeJesus said last week. "Why wasn't that done first?"

City officials cited "contractual issues" with the person being hired to perform the search. He is a health physicist, a person trained in the effects and properties of radioactive materials. The city doesn't have a health physicist on staff.

**Commented [RK6]:** The reporters omit the clarification that the soil was analyzed for disposal, has been accepted by the landfill, and will be removed.

**Commented [RK7]:** We did not limit our involvement to next year, but said it is part of our ongoing commitment — both before this current round of tests and into the future.

**Commented [RK8]:** That assurance is based on evidence.

**Commented [RK9]:** Here the reporters omit the history of Building 606 in relation to the overall shipyard, even though they were reminded of that as part of DPH responses for this story: "Remember, Building 606 is not part of the Navy's cleanup and restoration of the Hunters Point Shipyard. It was built in 1989, long after the radiological activities at the Shipyard had concluded. Construction of Building 606 entailed the excavation of soil down to 5.5 feet below the building, placing of a foundation, and constructing a brand new building on top." Not including that history is a disservice to readers and omits important information they could use to make up their own minds about the situation.

**Commented [RK10]:** The air filters have been tested, with no findings of concern, and that is omitted from the story. The radiation scan also will include the air filters.



So far, only a very limited radiation scan has been performed at Building 606, confined to a single pile of soil that has been sitting next to the building for months awaiting disposal.

The soil was excavated to install a new sewer tank next to the building. A contractor hired by the health department took only one sample of the soil pile to test for radioactive substances. Although the levels measured were below the Navy's cleanup standards for the former shipyard, those standards are based on science that is now obsolete. Compared with the EPA's current default goals for soil at Superfund sites, the quantities of radioactive uranium-235 and cobalt-60 found in the pile are four times higher than what the federal government aims for in residential areas.

"They should have taken many samples," said Daniel Hirsch, an independent watchdog of environmental cleanups and the former chair of environmental and nuclear policy at UC Santa Cruz. "Why would one take only a single data point if one wanted to determine safety?" he asked, and why not compare it to the EPA's current safety limits.

Similarly, a recent test of the tap water at Building 606 raises as many questions as it answers.

According to data from the San Francisco Public Utilities Commission, whose water-quality laboratory tested the samples, the amount of lead in one sample was 31 parts per billion, about twice the regulatory "action" level of 15 parts per billion.

If a city finds lead above this level, the EPA says, it should take steps to reduce it. But lower levels of lead may still cause health problems. Another sample taken recently at Building 606 contained lead at 11 parts per billion. The presence of lead suggests that there may be corrosion in the building's pipes.

Other types of contaminants weren't detected at all in Building 606's water, including volatile organic compounds and pesticides.

However, given the limited testing done, these results may not mean much, experts said.

The Public Health Department tested the water from only two locations inside the building and two locations outside — and took only one sample from each location. The building contains other taps that weren't tested.

"Ideally, you would measure every tap, because they all could be different," said Kara Nelson, professor of civil and environmental engineering at UC Berkeley and an expert on urban water supplies. "And then you'd do two sets of samples at least. ... It's not recommended ever to put that much weight on a single sample. Weird things can happen with single samples."

Past tests done by the health department were more rigorous. Twenty years ago, industrial hygienists directed a program of water monitoring at Building 606, taking seven sets of samples over a 10-month period from 1997 to 1998. Each round of testing analyzed up to 12 samples from as many as four locations within the building. Those tests first established the presence of lead and other contaminants in the building's water.

Andrew DeGraca, director of the water quality division at the San Francisco Public Utilities Commission, told The Chronicle that if the health department wanted "a higher level of certainty" that Building 606's water is now safe, "obviously you'd go to every single tap in the building" and run tests.

**Commented [RK11]:** False. The sample was a composite drawn from 4 sites. This answer was provided to the Chronicle on 12/19 and it also appears in the test results they reviewed.

**Commented [RK12]:** It would help the reader to understand that the soil was being evaluated for disposal. The employees of B606 have no exposure to the soil, and therefore no risk. The soil has been accepted at landfill and will be removed.

**Commented [RK13]:** Correct. DPH and SFPD presented this information to B606 employees and discussed it with them.

**Commented [RK14]:** It may also be attributed to leaching of lead from the pipes, which is not corrosion. This was explained to the Chronicle.

**Commented [RK15]:** The water safety testing plan was developed with DPH and PUC. Both agencies answered why two taps were tested inside the building, and the answers do not appear in the story.

He said officials might also perform what's known as a "10-bottle test," a procedure that involves filling 10 one-liter bottles with tap water from multiple locations and using the samples to trace the source of corrosion products. The PUC often uses the 10-bottle test when it analyzes water in San Francisco schools when lead levels are above 50 parts per billion.

Asked why more rigorous tests weren't performed at Building 606, DeGraca said the PUC was following the lead of the health department, which designed the testing plan and didn't ask for an opinion about the results — or any corrective actions.

"We weren't looking at the data and analyzing that," he said. "That was not something we were asked to do."

The health department has said that thoroughly running the water in Building 606 should eliminate any lead concerns, and there is also a plan to install water filters in the building. Bottled water will continue to be provided to Building 606 employees.

In the past, the Public Health Department misled police and the public about the water at Building 606, downplaying problems and misrepresenting test results.

For instance, in 2007, a top official at the health agency, Vickie Wells, wrote an email to a police captain telling him that Building 606 occupants shouldn't drink the tap water. She gave two reasons why it might be unsafe. Because the police were one of the few tenants at Hunters Point, she wrote, the water volume running through the shipyard's pipes was low, possibly leading to "water sitting in pipes for prolonged periods of time, which could result in water quality issues." She also pointed out that previous tests of Building 606's water had shown contamination with hydrocarbon compounds and lead.

"I would strongly recommend that bottled drinking water be retained for Bldg 606 at Hunters Point," Wells concluded in the email to the captain.

Three years later, though, she denied ever saying that.

"We never recommended bottled water," Wells wrote in a 2010 email to health department colleagues.

Wells has since retired.

Health department spokeswoman Kagan said there was no contradiction between the two emails. The 2010 email "restates what was written" in the 2007 email, she said.

"The safety of the building," she said, "has been reaffirmed each time."

**Commented [RK16]:** This is a misrepresentation of the collaboration between the agencies. Both PUC and DPH sent the Chronicle statements underscoring that the work was done together, in part because of concern after the interview w DeGraca that the Chronicle was seeking to portray a conflict or division between the two agencies, which does not exist. Those statements of collaboration were ignored.

**Commented [RK17]:** That is an accusation with no foundation.

**Commented [RK18]:** This email exchange was questioned by the Chronicle for an earlier story and was explained. Yet, they continue to misrepresent it. Also, it has nothing to do with the testing done in 2018.

## DPH RESPONSES TO CHRONICLE RE B606 TESTS – Dec 2018

In chrono order – most recent on top.

### 12/18/18 inquiry from Chronicle

Hi Rachael. Here are some questions for a story we're writing about Building 606 testing process and results.

Given our deadline, we need responses by **noon tomorrow** (Wednesday):

-- It looks like there were only two water samples taken inside Building 606, total -- one in each of two locations. This is what PUC told us when we asked them. Why so few samples, in so few locations? Building 606 is a 90,000-square-foot building with many other water taps that were not tested. In 1997 and 1998, industrial hygienist Ed Ochi regularly gathered water quality data from as many as five different locations within the building, and took multiple samples from those locations: 7 samples in June 1997, four samples in July 1997, 21 samples in August 1997, 12 samples in September 1997, 12 samples in October 1997, and so on. Why was the water testing so much more comprehensive in 1997, and so minimal today?

-- An expert from the Berkeley Water Center told us that it's very difficult to draw conclusions about the safety of water from so few samples. Ideally, she said, every tap in the building would be tested multiple times, on multiple days. It's not good practice to draw conclusions from so few samples. Why does SFDPH think that this minimal water testing is adequate to draw conclusions about the safety of the water?

-- Why was the test so minimal? Which personnel at the health department designed this water test, and what was the purpose of only taking two samples inside the building?

-- We spoke with Andrew DeGraca in the PUC's water quality division. He said that the health department didn't ask PUC for an analysis of the lab data on these samples: "We weren't looking at the data and analyzing that. That was not something we were asked to do." Why didn't the health department ask the city's water quality experts for their analysis?

-- DeGraca said that if the health department wanted "a higher level of certainty" that the building's water was safe, "obviously you'd go to every single tap in the building" and test the taps. You might also do a "10-bottle test," as is done in some SF schools when water is tested. Why weren't these more extensive tests performed?

-- Why weren't the hot water taps tested? In 1997 and 1998, some of the most elevated levels of contaminants (lead, TEPH) were measured from the building's hot water taps. Why wouldn't the health department want the hot water tested as well?

-- Was the water tested for TEPH (Total Extractable Petroleum Hydrocarbons)? If not, why not? Ochi found TEPH in the water when he was doing the monitoring.

-- High levels of lead and aluminum were found in Building 606's pipes. Does this raise concerns about possible corrosion in the pipes? Can the health department provide some kind of comprehensive analysis to show that lead levels aren't high in the taps that weren't tested?

-- From the EERG/TestAmerica report on the rad testing of the soil pile, it appears that only one soil sample was taken from the pile (sample ID 720-88635-1, pages 7 and 8). The sample summary on page 16 also lists only one sample with the same ID number. Is this correct? How many samples were taken from the pile, and where were they taken from? And if only one sample was taken, how can the health department draw any conclusions about the safety of that soil? Experts tell us that one sample is not enough to draw sound, scientific conclusions.

-- It also appears that outdated health standards were used by the health department to interpret the rad results of the sample from the soil pile. It's true that the rad levels are below the Navy's cleanup standards for Hunters Point, but as we and independent experts have pointed out in the past, these standards are based on obsolete science. Compared with the current default residential EPA PRGs for soil at Superfund sites, the measured levels of Uranium-235 and Cobalt-60 in the pile are four times higher than what the EPA considers acceptable. Why does the health department consider these levels acceptable? (We feel that residential limits are a fair basis for comparison given the planned future use of the site and the fact that police who train outdoors in an active remediation area have additional potential exposures that are not accounted for in the models — see our story on Building 606 and RSY2 for an example.)

-- What were the minimum detection limits of the equipment used to test the soil pile? The report lists DLCs, "Decision Level Concentration," but these are usually higher than minimum detectable levels. It appears that the test wasn't sensitive enough to detect concentrations of radionuclides in the soil at levels required by the EPA's default PRGs.

-- According to testimony at the December 12 Police Commission hearing, the health department agreed in July that Building 606 and surrounding areas should be tested for radionuclides, but the tests have still not been performed and are now scheduled for January. Commissioner Petra DeJesus asked, "Why would we delay the radiological testing until January? Why wasn't that done first?" DeJesus also said, "I think we're really taking a risk with their lives. I don't understand why we don't really put pressure on the mayor's office and expedite removing them." What is your response to this? Why have these tests deemed necessary by SFDPH been delayed until January? And shouldn't the 40 employees currently working at the building be moved to another location until these pending radiological tests can confirm their safety? Why does the department think it's safe to keep 40 city employees at the building given this uncertainty and the delay in the tests? Is the health department "taking a risk with their lives"?

-- Given the apparent inadequacy of the water and radionuclide tests that have been performed to date, how can the health department say that "there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup"?

Thanks

Jason and Cynthia

## 12/19/18 DPH response to SF Chronicle

### 1. Here is the response to the questions about water testing:

SFDPH Occupational Safety and Health (OSH), SFDPH Environmental Health, SFPD and SFPUC worked collaboratively in the development of a comprehensive Building 606 drinking water sampling and analysis plan. Sampling locations were selected to characterize and compare drinking water quality and chemistry inside Building 606 and the SFPUC distribution system outside the building. Collecting samples at the entrance to the building and at the furthest tap effectively characterizes the water in the whole building as it confirms whether there is any change in water quality.

Drinking water was sampled at the kitchenette faucet which is located at terminal end of Building 606 water supply and where water is most likely collect and stagnate. Our sampling did not include hot water or boilers because this water is not ingested. Water from boilers and hot water heaters can collect metals from the materials of the tanks. This is expected, and would not usually indicate anything actionable.

Water samples were analyzed for a wide variety of water chemistry parameters and potential contaminants including heavy metals, pesticides, herbicides, volatile organic compounds, radiological compounds, disinfection products and total extractable petroleum hydrocarbons (see page 3 of the results, and look for "SUB\_8015M(EPA 8015) TPH DRO").

The test results were reviewed and discussed collaboratively among staff from DPH Environmental Health, DPH OSH, and PUC Water Quality Division. Together staff determined that the results were benign for all parameters except for lead in one location.

Lead was detected in the men's shower room sink faucet above the federal Action Level of 15 ppb. Since elevated lead was not detected in sample outside building the lead source is within Building 606 fixtures and pipes. The detection of lead in the water samples is indeed indicative of leaching from the pipes (not necessarily corrosion – leaching can occur just from water sitting in a pipe overnight). SFPUC, SFDPH and SFPD are continuing to work together on water quality issues which will include future monitoring.

### 2. Here is the response to questions about soil testing:

The chain of custody attached to the Test America analytical report states: "One sample was collected from a 4 point composite."

This sample was collected to characterize the soil for disposal.

Although the soil was analyzed for disposal, the additional radionuclides testing was done to learn more about the soil pile, and the findings are that the radionuclides are below the release criteria for the Shipyard cleanup. There is no exposure or risk to Building 606 employees from the soil pile, and it will be removed shortly.

Information about the equipment used by the laboratory to analyze the samples is in the report from Test America.

3. Here is the response to the last two questions:

There is no risk to the health and safety of employees at Building 606. The radiological testing will be conducted by an independent expert. The timeline was not as fast as we would have liked, but that does not mean that employees are endangered. Building 606 was found suitable for lease many years ago, under the conditions of a strict federal and state regulatory process. Remember, Building 606 is not part of the Navy's cleanup and restoration of the Hunters Point Shipyard. It was built in 1989, long after the radiological activities at the Shipyard had concluded. Construction of Building 606 entailed the excavation of soil down to 5.5 feet below the building, placing of a foundation, and constructing a brand new building on top.

The Police Department does have a longstanding plan to relocate the operations and employees currently at Building 606. Please check with them for more information about that.

The health and safety tests were adequate, and are part of our ongoing attention to the building. The results were shared and discussed with the employees of Building 606, who are the focus of our attention. Their health and safety is our top priority. The testing of the building continues to affirm that there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup. We will continue to work with the Building 606 employees and respond to any concerns, in collaboration with the San Francisco Police Department and other relevant agencies.

12/19/18 – response from PUC to Chronicle

The SFPUC was asked to provide drinking water monitoring support by the San Francisco Department of Public Health (SFPDH) at Building 606. Based on a review of sample results from the previous 15 rounds of monitoring between 1993 and 2018, and the findings from a joint site visit with SFPDH and San Francisco Police Department representatives, a draft plan was prepared by SFPUC, which SFPDH edited and approved.

The sampling goal was to provide a cost-effective, representative picture of the quality of drinking water entering the building and within the building at water taps agreed by SFPDH and SFPD. The objective was to obtain the quality of the water for drinking by the occupants of Building 606. Water not recommended for drinking, such as boiler feed, showers and hot water was excluded from sampling.

The initial results show that the water quality of the facility met State and Federal drinking water standards, with the exception of a lead result above the Action Level at one tap, which we recommended mitigating through flushing, fixture replacement, or filters. Based on the initial results, a follow-up monitoring plan will be developed in collaboration with the SFPDH.

Questions:

- Can you confirm that only 1 water sample was taken and tested from each of two locations inside Building 606 -- i.e., the total number of samples from inside the building tested by PUC was 2? And similarly, that 1 sample was taken from each of 2 outdoor locations? For a total of 4 samples both indoors and outdoors?

- Yes. There were two total from within Building 606, and two total from outside of Building 606.
- Were any of the samples tested for TEPH, Total Extractable Petroleum Hydrocarbons (which were an issue in the 1997 water tests of Building 606)?
  - Per the sampling plan, total extractable petroleum hydrocarbon was analyzed for all four samples collected for Building 606 monitoring. The TPH diesel range organics results were below the detection limit of 0.05 mg/L (shown as TPH DRO analysis on page 3 of each report) at all 4 locations.
- How much did these lab tests cost, total, and who paid for them?
  - The laboratory test cost is \$7,900 for the 3 samples collected on the property of Building 606. Sample collection and handling was an additional \$1,100. The San Francisco Police Department will ultimately be responsible for reimbursing the SFPUC for this cost.

12/14/18 DPH response to Chronicle

*Here is the report and answers to your questions. Also, an overview on the progress of Building 606 testing.*

*We are glad for the opportunity to work closely with the SFPD and their employees to respond to their concerns. It is very important that the people who work at Building 606 every day know that they can ask questions and get responses. Most important, of course, is that they are safe and feel safe.*

*At this point, all of the testing done to date confirm that there is no evidence of health hazards at Building 606 related to the Shipyard cleanup and restoration. It's good to see the test results come back so consistently. They affirm that the police employees are not at risk at the Shipyard. We will continue to work with the SFPD and Building 606 employees on any questions or concerns they have.*

*To summarize, the air, dust, water and soil testing agreed to in July are done. Highlights include:*

- *Settled dust tested in warehouse found no asbestos or lead*
- *Testing of the soil pile near the building found all radionuclides below the release criteria for the Shipyard cleanup set by the EPA*
- *The soil was tested for disposal, has been accepted by the landfill and will be removed*
- *The potable water testing found no radionuclides, pesticides, semi-volatile or volatile organic compounds*
- *Of two indoor faucets tested, lead was found in both. In one, in the shower room, the levels were above the federal action level. In the other, at a kitchenette sink, the levels were below. We are working with PUC on continued monitoring and testing. This is believed to be caused by the building's pipes, and not from the exterior water source. Meanwhile, staff are instructed to flush the water before drinking it, water filters are being added to the three sinks in the building, and bottled water will continue to be provided. The water is safe for showering, hand washing and dish washing.*

- *Air quality was previously tested and reported in September, with no findings of lead or asbestos.*

*What remains to be done:*

- *Testing of standing water in the crawl space – to be done when there is standing water*
- *Radiological health & safety screening of the interior and exterior of the building – expected in mid-January*
- *Continued potable water monitoring and evaluation*
- *Periodic indoor air monitoring*
- *Ongoing communication and information to B606 employees regarding Navy Shipyard*

Are the radionuclide levels included in this report? The PowerPoint you sent us mentions that "All radionuclide parameters were found to be below release criteria set by Navy, EPA, & CDPH" in the soil pile, but I don't see radionuclides in the EERG report. I see tests for VOCs, metals, PCBs, etc., but not radionuclides. I could be missing something?

*The radionuclides were analyzed in a separate report, which is attached. Although the soil was analyzed for disposal, the additional radionuclides testing was done to learn more about the soil pile, and the findings are that the radionuclides are below the release criteria for the Shipyard cleanup. There is no exposure or risk to Building 606 employees from the soil pile, and it will be removed shortly.*

Also, can you tell us exactly which health-based standards you are applying to all of these test results -- air, soil, radionuclide, and water? The health-based standards don't appear to be listed in the reports.

*In each case these elements were tested and not found to be at levels to cause public health concern, therefore there is no health risk to the employees at Building 606. The summary above and the slides presented on Dec 10 provide information on how each element was considered.*

Additionally, I've been looking at the PUC water test results for 606 and it appears that in some samples there are levels of certain analytes in the water above the EPA and state Maximum Contaminant Levels, including arsenic and a number of VOCs. What does the health department mean on page 9 of the PowerPoint where it says "Not Detected: Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Radionuclides, and Pesticides"? From the results column, it appears that some analytes that aren't found in normal San Francisco PUC water are not only detected in the Building 606 water (i.e. there's a measured level above the detection limit that is given in the report) but the levels in some cases are above federal and state MCLs.

*We reviewed all the PUC data and there were no exceedances within the Shipyard or Building 606 sources. The only lab report that showed any exceedances of the MCL (>MCL) was the report labeled FEBCO, which is the main SFPUC supply on Crisp Road that provides pre-filtered water to HPS/Bldg. 606. Those exceedances were: Iron (Fe), Aluminum, (Al), Manganese, (Mn). Those levels did not appear again in the Shipyard or Building 606 locations tested.*



*Lead (Pb) was detected in one sample inside Bldg. 606 at 31ug/L (31 ppb), in the men's first floor shower room, which is above the Action Level of 15 ppb. At the second floor kitchen sink lead was detected at 11ug/L (11 ppb), which is below the action level.*

The Powerpoint says, "Lead was detected below the Action Level in the 2nd floor kitchen," but in the report titled "PoliceCommission121218-BLDG6062ndFLRm201kitchen.pdf," which I assume is the results for the second floor kitchen, there are two samples with lead readings **above** the 15 ppb action level -- one lead level is 31 ppb and the other is 34 ppb.

*This confusion appears to be from your mis-reading of the lab results. Both the 31 ppb and the 34 ppb levels you reference are part of the lab's quality control and not actual readings from the building itself.*

*If you look at the key on page 14, those are labeled LCS and SPK – which are laboratory controlled samples and not readings from the building sample. The lead reading on page 1 is the actual finding from the building itself. Pages 1-3 represent the actual sample data from the location and the remaining pages are the quality control standards and not sample results.*

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Friday, December 14, 2018 9:13 AM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Can you send us the EERG radionuclide results today? Thanks.

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**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 5:18 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

Can you add another question to the hygienists?

The Powerpoint says, "Lead was detected below the Action Level in the 2<sup>nd</sup> floor kitchen," but in the report titled "PoliceCommission121218-BLDG6062ndFLRm201kitchen.pdf," which I assume is the results for the second floor kitchen, there are two samples with lead readings **above** the 15 ppb action level -- one lead level is 31 ppb and the other is 34 ppb.

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**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 4:04 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

Ok, thanks.

---

**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 4:03 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

I will follow up with the industrial hygienists on these questions. I don't have that level of detail myself.

Thanks,  
Rachael

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**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Thursday, December 13, 2018 3:37 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Thanks. Are the radionuclide levels included in this report? The PowerPoint you sent us mentions that "All radionuclide parameters were found to be below release criteria set by Navy, EPA, & CDPH" in the soil pile, but I don't see radionuclides in the EERG report. I see tests for VOCs, metals, PCBs, etc., but not radionuclides. I could be missing something?

Also, can you tell us exactly which health-based standards you are applying to all of these test results -- air, soil, radionuclide, and water? The health-based standards don't appear to be listed in the reports.

Additionally, I've been looking at the PUC water test results for 606 and it appears that in some samples there are levels of certain analytes in the water above the EPA and state Maximum Contaminant Levels, including arsenic and a number of VOCs. What does the health department mean on page 9 of the PowerPoint where it says "Not Detected: Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Radionuclides, and Pesticides"? From the results column, it appears that some analytes that aren't found in normal San Francisco PUC water are not only detected in the Building 606 water (i.e. there's a measured level above the detection limit that is given in the report) but the levels in some cases are above federal and state MCLs.

thanks,  
Jason

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 3:07 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

[https://www.sfdph.org/dph/files/newsMediadocs/2018PR/HPNS Crime Lab Analytical Results.pdf](https://www.sfdph.org/dph/files/newsMediadocs/2018PR/HPNS_Crime_Lab_Analytical_Results.pdf)

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Thursday, December 13, 2018 2:13 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Rachael, can you send us the EERG report / results on the soil pile? It doesn't appear to have been included in the documents posted on the police commission site. Thanks.

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**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 1:50 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

got it, thanks

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 1:18 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Wednesday, December 12, 2018 1:15 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Thanks.

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Wednesday, December 12, 2018 1:10:12 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

We don't have a formal report, but I can send you the latest B606 update tomorrow morning. There will be a full report when all testing is completed.

Thanks,  
Rachael

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Tuesday, December 11, 2018 12:25 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** report on 606 tests?

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Rachael. We heard that the health department is issuing its report on recent tests at Building 606. When will this be released, and can you send us the document? Thanks.

--

Jason Fagone  
Reporter, San Francisco Chronicle  
[jason.fagone@sfchronicle.com](mailto:jason.fagone@sfchronicle.com)  
office phone: 415-777-6018

## **Cretan, Jeff (MYR)**

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**From:** Kagan, Rachael (DPH)  
**Sent:** Friday, December 21, 2018 10:24 AM  
**To:** Wagner, Greg (DPH)  
**Cc:** Cretan, Jeff (MYR)  
**Subject:** Chronicle response re B606  
**Attachments:** Memo to SF Chronicle from DPH and PUC 12 21 18.docx; DPH and PUC response to Chronicle re B606 Dec tests.docx

Here is the B606 story response that will be sent to the Chronicle today, from DPH and PUC.

Thanks,  
Rachael

Rachael Kagan  
Director of Communications  
San Francisco Department of Public Health  
101 Grove Street  
San Francisco, CA 94102  
415 554-2507  
415 420-5017 cell

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Thursday, December 20, 2018 11:51 AM  
**To:** Stevenson, David (POL); Cretan, Jeff (MYR); Reisman, Will (PUC)  
**Subject:** RE: B606 story  
**Attachments:** Sf Chronicle story 12 20 18 annotated.docx; DPH response to Chronicle re B606 Dec tests.docx

Here is the story, with annotations. Take a look and see what you think. If you have additional comments, please feel free to make them.

We can consider next steps.

Also attached are the DPH responses to the questions that went into this story. I also included PUC's response from yesterday re water testing.

Thanks,  
Rachael

-----Original Message-----

**From:** Kagan, Rachael (DPH)  
**Sent:** Thursday, December 20, 2018 6:53 AM  
**To:** Stevenson, David (POL) <david.c.stevenson@sfgov.org>; Cretan, Jeff (MYR) <jeff.cretan@sfgov.org>; Will Reisman <will.reisman@sfgov.org>  
**Subject:** B606 story

In today's Chron contains many inaccuracies.

I will highlight those later this morning and circulate. I thought you all might want to do the same.

We can consider next steps.

Thanks  
Rachael

Sent from my overrated iPhone

*Note: These reporters seem determined to portray Building 606 as unsafe, and reject any information that does not tell that story. The Health Department, PUC and the Police have provided voluminous responses to Chronicle questions over many months of stories about B606, most of which do not appear in the coverage. This is unfair to readers, to the B606 employees and to the agencies involved. Here is an annotated version of the most recent story, to point out these areas of omission, opinion or inaccuracy. The fact is, there is no evidence that the workers in Building 606 are not safe. We continue to work with them, and if there were a problem, now or in the future, we would look into it because their health and safety is our top priority.*

*Attached is the answers DPH provided for this story.*

San Francisco Chronicle

New questions about SF safety tests at Hunters Point shipyard building

[Jason Fagone](#) and [Cynthia Dizikes](#) Dec. 20, 2018 Updated: Dec. 20, 2018 8:46 a.m.

City employees who work at an unusual building deep inside a San Francisco Superfund site have been waiting for years to know if their surroundings are safe. But recent tests by the city health department won't provide much comfort.

The structure at the former Hunters Point Naval Shipyard, which has housed police employees since 1997 and contains the citywide crime lab, is known as Building 606. In July, after The Chronicle revealed significant health hazards there — and years of failed oversight by government agencies — the health department promised the roughly 40 remaining employees that it would test the building's air, soil and tap water for chemicals and radioactive substances known to exist elsewhere at the site.

Since then, however, one of the most crucial tests, a search for radioactivity inside the building and in surrounding soil, has been delayed. It is not scheduled to begin until at least mid-January.

Meanwhile, some tests that have been completed were minimal and poorly designed, independent experts say, raising the possibility that the people who work there are not safe.

"I think we're really taking a risk with their lives," Police Commission member Petra DeJesus said at a Dec. 12 hearing that discussed the testing at Building 606. "I don't understand why we don't really put pressure on the mayor's office and expedite removing them."

One of the newly completed tests was performed on the building's tap water, and another checked a nearby pile of soil. The water-quality test discovered an elevated level of lead in one sample and did not detect many other potential contaminants.

Due to concerns about the water's safety — past test results discovered troubling levels of lead, petroleum byproducts and other contaminants in the tap water — the Police Department has been providing bottled water to building occupants for two decades.

A sample from the soil pile contained radioactive substances at levels below the Navy's cleanup targets at the former shipyard, but above the default safety goals for Superfund sites set by the U.S. Environmental Protection Agency.

**Commented [RK1]:** Inaccurate. The Building was transferred to the city by the Navy as suitable for lease many years ago, under a strict federal and state regulatory process. The DPH and SFPD have worked together ever since the SFPD started using the building to respond to employee concerns and conduct tests as needed.

**Commented [RK2]:** That is an opinion, not a fact, and it is not attributed.

**Commented [RK3]:** We have provided an update on the status of all of those tests to the Chronicle, and they have omitted mention of several including air and dust.

**Commented [RK4]:** That is an opinion, not a fact. There is no history of radiation connected to the building, so one might also argue that the other tests, of building conditions, are more crucial.

**Commented [RK5]:** It is fine to question the tests, of course. However, there is no explanation provided of how differing standards or interpretations might be applied, only questions. The story also provides no mention of the tests that are not being questioned, and there is no conclusion presented by anyone that the workers are not safe. This seems to be a decision by the reporters — that the workers are unsafe — and they are not including any information that does not support that narrative.

**Commented [RK6]:** The reporters omit the clarification that the soil was analyzed for disposal, has been accepted by the landfill, and will be removed.



The city's health and police departments both said the testing that has been done should reassure employees and that no workers need to be relocated.

In testimony to the Police Commission, Deputy Police Chief Robert Moser said he saw no test results that required "any immediate action" to protect people in the building. The Department of Public Health said in a statement that the tests to date have been adequate and are part of ongoing checks that will continue next year, in collaboration with the Police Department and other agencies.

**Commented [RK7]:** We did not limit our involvement to next year, but said it is part of our ongoing commitment — both before this current round of tests and into the future.

"The testing of the building continues to affirm that there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup," said health department spokeswoman Rachael Kagan.

This argument is one that the city has been repeating for 20 years, assuring police employees that they shouldn't worry about working at the building. It's what employees were told even when a toxic waste dump 2,000 feet away caught on fire in 2000 and spewed smoke for days. And they heard it again when the Navy hauled thousands of truckloads of contaminated soil and dumped them next to the building in 2007, releasing potentially radioactive dust particles into the air.

**Commented [RK8]:** That assurance is based on evidence.

Radioactivity has been the dominant concern at the site since dozens of radioactive ships were hauled back to the shipyard in 1946 after nuclear tests in the Pacific. The area also was the site of federal nuclear labs that further spread toxic elements throughout buildings and the soil.

When the city promised to do more testing this year, potential exposure to radioactivity was again a significant concern of the building's employees. The health department told occupants in July that it would perform a comprehensive search for radioactive hazards indoors and outdoors — in the air filters, in the crawl space beneath the building and in the soil and parking areas around it.

**Commented [RK9]:** Here the reporters omit the history of Building 606 in relation to the overall shipyard, even though they were reminded of that as part of DPH responses for this story: "Remember, Building 606 is not part of the Navy's cleanup and restoration of the Hunters Point Shipyard. It was built in 1989, long after the radiological activities at the Shipyard had concluded. Construction of Building 606 entailed the excavation of soil down to 5.5 feet below the building, placing of a foundation, and constructing a brand new building on top." Not including that history is a disservice to readers and omits important information they could use to make up their own minds about the situation.

But five months later, that search has not begun — a delay that DeJesus found troubling.

"Why would we delay testing?" DeJesus said last week. "Why wasn't that done first?"

City officials cited "contractual issues" with the person being hired to perform the search. He is a health physicist, a person trained in the effects and properties of radioactive materials. The city doesn't have a health physicist on staff.

**Commented [RK10]:** The air filters have been tested, and that is omitted from the story.

So far, only a very limited radiation scan has been performed at Building 606, confined to a single pile of soil that has been sitting next to the building for months awaiting disposal.

The soil was excavated to install a new sewer tank next to the building. A contractor hired by the health department took only one sample of the soil pile to test for radioactive substances. Although the levels measured were below the Navy's cleanup standards for the former shipyard, those standards are based on science that is now obsolete. Compared with the EPA's current default goals for soil at Superfund sites, the quantities of radioactive uranium-235 and cobalt-60 found in the pile are four times higher than what the federal government aims for in residential areas.

**Commented [RK11]:** False. The sample was a composite drawn from 4 sites. This answer was provided to the Chronicle on 12/19 and it also appears in the test results they reviewed.

"They should have taken many samples," said Daniel Hirsch, an independent watchdog of environmental cleanups and the former chair of environmental and nuclear policy at UC Santa Cruz. "Why would one take only a single data point if one wanted to determine safety?" he asked, and why not compare it to the EPA's current safety limits.

**Commented [RK12]:** It would help the reader to understand that the soil was being evaluated for disposal. The employees of B606 have no exposure to the soil, and therefore no risk. The soil has been accepted at landfill and will be removed.



Similarly, a recent test of the tap water at Building 606 raises as many questions as it answers.

According to data from the San Francisco Public Utilities Commission, whose water-quality laboratory tested the samples, the amount of lead in one sample was 31 parts per billion, about twice the regulatory “action” level of 15 parts per billion.

**Commented [RK13]:** Correct. DPH and SFPD presented this information to B606 employees and discussed it with them.

If a city finds lead above this level, the EPA says, it should take steps to reduce it. But lower levels of lead may still cause health problems. Another sample taken recently at Building 606 contained lead at 11 parts per billion. The presence of lead suggests that there may be corrosion in the building’s pipes.

**Commented [RK14]:** It may also be attributed to leaching of lead from the pipes, which is not corrosion. This was explained to the Chronicle.

Other types of contaminants weren’t detected at all in Building 606’s water, including volatile organic compounds and pesticides.

However, given the limited testing done, these results may not mean much, experts said.

The Public Health Department tested the water from only two locations inside the building and two locations outside — and took only one sample from each location. The building contains other taps that weren’t tested.

**Commented [RK15]:** The water safety testing plan was developed with DPH and PUC. Both agencies answered why two taps were tested inside the building, and the answers do not appear in the story.

“Ideally, you would measure every tap, because they all could be different,” said Kara Nelson, professor of civil and environmental engineering at UC Berkeley and an expert on urban water supplies. “And then you’d do two sets of samples at least. ... It’s not recommended ever to put that much weight on a single sample. Weird things can happen with single samples.”

Past tests done by the health department were more rigorous. Twenty years ago, industrial hygienists directed a program of water monitoring at Building 606, taking seven sets of samples over a 10-month period from 1997 to 1998. Each round of testing analyzed up to 12 samples from as many as four locations within the building. Those tests first established the presence of lead and other contaminants in the building’s water.

Andrew DeGraca, director of the water quality division at the San Francisco Public Utilities Commission, told The Chronicle that if the health department wanted “a higher level of certainty” that Building 606’s water is now safe, “obviously you’d go to every single tap in the building” and run tests.

He said officials might also perform what’s known as a “10-bottle test,” a procedure that involves filling 10 one-liter bottles with tap water from multiple locations and using the samples to trace the source of corrosion products. The PUC often uses the 10-bottle test when it analyzes water in San Francisco schools when lead levels are above 50 parts per billion.

Asked why more rigorous tests weren’t performed at Building 606, DeGraca said the PUC was following the lead of the health department, which designed the testing plan and didn’t ask for an opinion about the results — or any corrective actions.

**Commented [RK16]:** This is a misrepresentation of the collaboration between the agencies. Both PUC and DPH sent the Chronicle statements underscoring that the work was done together, in part because of concern after the interview w DeGraca that the Chronicle was seeking to portray a conflict or division between the two agencies, which does not exist. Those statements of collaboration were ignored.

“We weren’t looking at the data and analyzing that,” he said. “That was not something we were asked to do.”

The health department has said that thoroughly running the water in Building 606 should eliminate any lead concerns, and there is also a plan to install water filters in the building. Bottled water will continue to be provided to Building 606 employees.

In the past, the Public Health Department misled police and the public about the water at Building 606, downplaying problems and misrepresenting test results.

**Commented [RK17]:** That is an accusation with no foundation.

For instance, in 2007, a top official at the health agency, Vickie Wells, wrote an email to a police captain telling him that Building 606 occupants shouldn't drink the tap water. She gave two reasons why it might be unsafe. Because the police were one of the few tenants at Hunters Point, she wrote, the water volume running through the shipyard's pipes was low, possibly leading to "water sitting in pipes for prolonged periods of time, which could result in water quality issues." She also pointed out that previous tests of Building 606's water had shown contamination with hydrocarbon compounds and lead.

**Commented [RK18]:** This email exchange was questioned by the Chronicle for an earlier story and was explained. Yet, they continue to misrepresent it. Also, it has nothing to do with the testing done in 2018.

"I would strongly recommend that bottled drinking water be retained for Bldg 606 at Hunters Point," Wells concluded in the email to the captain.

Three years later, though, she denied ever saying that.

"We never recommended bottled water," Wells wrote in a 2010 email to health department colleagues.

Wells has since retired.

Health department spokeswoman Kagan said there was no contradiction between the two emails. The 2010 email "restates what was written" in the 2007 email, she said.

"The safety of the building," she said, "has been reaffirmed each time."

## DPH RESPONSES TO CHRONICLE RE B606 TESTS – Dec 2018

In chrono order – most recent on top.

12/18/18 inquiry from Chronicle

Hi Rachael. Here are some questions for a story we're writing about Building 606 testing process and results.

Given our deadline, we need responses by **noon tomorrow** (Wednesday):

-- It looks like there were only two water samples taken inside Building 606, total -- one in each of two locations. This is what PUC told us when we asked them. Why so few samples, in so few locations? Building 606 is a 90,000-square-foot building with many other water taps that were not tested. In 1997 and 1998, industrial hygienist Ed Ochi regularly gathered water quality data from as many as five different locations within the building, and took multiple samples from those locations: 7 samples in June 1997, four samples in July 1997, 21 samples in August 1997, 12 samples in September 1997, 12 samples in October 1997, and so on. Why was the water testing so much more comprehensive in 1997, and so minimal today?

-- An expert from the Berkeley Water Center told us that it's very difficult to draw conclusions about the safety of water from so few samples. Ideally, she said, every tap in the building would be tested multiple times, on multiple days. It's not good practice to draw conclusions from so few samples. Why does SFDPH think that this minimal water testing is adequate to draw conclusions about the safety of the water?

-- Why was the test so minimal? Which personnel at the health department designed this water test, and what was the purpose of only taking two samples inside the building?

-- We spoke with Andrew DeGraca in the PUC's water quality division. He said that the health department didn't ask PUC for an analysis of the lab data on these samples: "We weren't looking at the data and analyzing that. That was not something we were asked to do." Why didn't the health department ask the city's water quality experts for their analysis?

-- DeGraca said that if the health department wanted "a higher level of certainty" that the building's water was safe, "obviously you'd go to every single tap in the building" and test the taps. You might also do a "10-bottle test," as is done in some SF schools when water is tested. Why weren't these more extensive tests performed?

-- Why weren't the hot water taps tested? In 1997 and 1998, some of the most elevated levels of contaminants (lead, TEPH) were measured from the building's hot water taps. Why wouldn't the health department want the hot water tested as well?

-- Was the water tested for TEPH (Total Extractable Petroleum Hydrocarbons)? If not, why not? Ochi found TEPH in the water when he was doing the monitoring.

-- High levels of lead and aluminum were found in Building 606's pipes. Does this raise concerns about possible corrosion in the pipes? Can the health department provide some kind of comprehensive analysis to show that lead levels aren't high in the taps that weren't tested?

-- From the EERG/TestAmerica report on the rad testing of the soil pile, it appears that only one soil sample was taken from the pile (sample ID 720-88635-1, pages 7 and 8). The sample summary on page 16 also lists only one sample with the same ID number. Is this correct? How many samples were taken from the pile, and where were they taken from? And if only one sample was taken, how can the health department draw any conclusions about the safety of that soil? Experts tell us that one sample is not enough to draw sound, scientific conclusions.

-- It also appears that outdated health standards were used by the health department to interpret the rad results of the sample from the soil pile. It's true that the rad levels are below the Navy's cleanup standards for Hunters Point, but as we and independent experts have pointed out in the past, these standards are based on obsolete science. Compared with the current default residential EPA PRGs for soil at Superfund sites, the measured levels of Uranium-235 and Cobalt-60 in the pile are four times higher than what the EPA considers acceptable. Why does the health department consider these levels acceptable? (We feel that residential limits are a fair basis for comparison given the planned future use of the site and the fact that police who train outdoors in an active remediation area have additional potential exposures that are not accounted for in the models — see our story on Building 606 and RSY2 for an example.)

-- What were the minimum detection limits of the equipment used to test the soil pile? The report lists DLCs, "Decision Level Concentration," but these are usually higher than minimum detectable levels. It appears that the test wasn't sensitive enough to detect concentrations of radionuclides in the soil at levels required by the EPA's default PRGs.

-- According to testimony at the December 12 Police Commission hearing, the health department agreed in July that Building 606 and surrounding areas should be tested for radionuclides, but the tests have still not been performed and are now scheduled for January. Commissioner Petra DeJesus asked, "Why would we delay the radiological testing until January? Why wasn't that done first?" DeJesus also said, "I think we're really taking a risk with their lives. I don't understand why we don't really put pressure on the mayor's office and expedite removing them." What is your response to this? Why have these tests deemed necessary by SFDPH been delayed until January? And shouldn't the 40 employees currently working at the building be moved to another location until these pending radiological tests can confirm their safety? Why does the department think it's safe to keep 40 city employees at the building given this uncertainty and the delay in the tests? Is the health department "taking a risk with their lives"?

-- Given the apparent inadequacy of the water and radionuclide tests that have been performed to date, how can the health department say that "there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup"?

Thanks

Jason and Cynthia

12/19/18 DPH response to SF Chronicle

1. Here is the response to the questions about water testing:

SFDPH Occupational Safety and Health (OSH), SFDPH Environmental Health, SFPD and SFPUC worked collaboratively in the development of a comprehensive Building 606 drinking water sampling and analysis plan. Sampling locations were selected to characterize and compare drinking water quality and chemistry inside Building 606 and the SFPUC distribution system outside the building. Collecting samples at the entrance to the building and at the furthest tap effectively characterizes the water in the whole building as it confirms whether there is any change in water quality.

Drinking water was sampled at the kitchenette faucet which is located at terminal end of Building 606 water supply and where water is most likely collect and stagnate. Our sampling did not include hot water or boilers because this water is not ingested. Water from boilers and hot water heaters can collect metals from the materials of the tanks. This is expected, and would not usually indicate anything actionable.

Water samples were analyzed for a wide variety of water chemistry parameters and potential contaminants including heavy metals, pesticides, herbicides, volatile organic compounds, radiological compounds, disinfection products and total extractable petroleum hydrocarbons (see page 3 of the results, and look for "SUB\_8015M(EPA 8015) TPH DRO").

The test results were reviewed and discussed collaboratively among staff from DPH Environmental Health, DPH OSH, and PUC Water Quality Division. Together staff determined that the results were benign for all parameters except for lead in one location.

Lead was detected in the men's shower room sink faucet above the federal Action Level of 15 ppb. Since elevated lead was not detected in sample outside building the lead source is within Building 606 fixtures and pipes. The detection of lead in the water samples is indeed indicative of leaching from the pipes (not necessarily corrosion – leaching can occur just from water sitting in a pipe overnight). SFPUC, SFDPH and SFPD are continuing to work together on water quality issues which will include future monitoring.

2. Here is the response to questions about soil testing:

The chain of custody attached to the Test America analytical report states: "One sample was collected from a 4 point composite."

This sample was collected to characterize the soil for disposal.

Although the soil was analyzed for disposal, the additional radionuclides testing was done to learn more about the soil pile, and the findings are that the radionuclides are below the release criteria for the Shipyard cleanup. There is no exposure or risk to Building 606 employees from the soil pile, and it will be removed shortly.

Information about the equipment used by the laboratory to analyze the samples is in the report from Test America.

3. Here is the response to the last two questions:

There is no risk to the health and safety of employees at Building 606. The radiological testing will be conducted by an independent expert. The timeline was not as fast as we would have liked, but that does not mean that employees are endangered. Building 606 was found suitable for lease many years ago, under the conditions of a strict federal and state regulatory process. Remember, Building 606 is not part of the Navy's cleanup and restoration of the Hunters Point Shipyard. It was built in 1989, long after the radiological activities at the Shipyard had concluded. Construction of Building 606 entailed the excavation of soil down to 5.5 feet below the building, placing of a foundation, and constructing a brand new building on top.

The Police Department does have a longstanding plan to relocate the operations and employees currently at Building 606. Please check with them for more information about that.

The health and safety tests were adequate, and are part of our ongoing attention to the building. The results were shared and discussed with the employees of Building 606, who are the focus of our attention. Their health and safety is our top priority. The testing of the building continues to affirm that there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup. We will continue to work with the Building 606 employees and respond to any concerns, in collaboration with the San Francisco Police Department and other relevant agencies.

12/19/18 – response from PUC to Chronicle

The SFPUC was asked to provide drinking water monitoring support by the San Francisco Department of Public Health (SFPDH) at Building 606. Based on a review of sample results from the previous 15 rounds of monitoring between 1993 and 2018, and the findings from a joint site visit with SFPDH and San Francisco Police Department representatives, a draft plan was prepared by SFPUC, which SFPDH edited and approved.

The sampling goal was to provide a cost-effective, representative picture of the quality of drinking water entering the building and within the building at water taps agreed by SFPDH and SFPD. The objective was to obtain the quality of the water for drinking by the occupants of Building 606. Water not recommended for drinking, such as boiler feed, showers and hot water was excluded from sampling.

The initial results show that the water quality of the facility met State and Federal drinking water standards, with the exception of a lead result above the Action Level at one tap, which we recommended mitigating through flushing, fixture replacement, or filters. Based on the initial results, a follow-up monitoring plan will be developed in collaboration with the SFPDH.

Questions:

- Can you confirm that only 1 water sample was taken and tested from each of two locations inside Building 606 -- i.e., the total number of samples from inside the building tested by PUC was 2? And similarly, that 1 sample was taken from each of 2 outdoor locations? For a total of 4 samples both indoors and outdoors?
  - Yes. There were two total from within Building 606, and two total from outside of Building 606.
- Were any of the samples tested for TEPH, Total Extractable Petroleum Hydrocarbons (which were an issue in the 1997 water tests of Building 606)?
  - Per the sampling plan, total extractable petroleum hydrocarbon was analyzed for all four samples collected for Building 606 monitoring. The TPH diesel range organics results were below the detection limit of 0.05 mg/L (shown as TPH DRO analysis on page 3 of each report) at all 4 locations.
- How much did these lab tests cost, total, and who paid for them?
  - The laboratory test cost is \$7,900 for the 3 samples collected on the property of Building 606. Sample collection and handling was an additional \$1,100. The San Francisco Police Department will ultimately be responsible for reimbursing the SFPUC for this cost.

*12/14/18 DPH response to Chronicle*

*Here is the report and answers to your questions. Also, an overview on the progress of Building 606 testing.*

*We are glad for the opportunity to work closely with the SFPD and their employees to respond to their concerns. It is very important that the people who work at Building 606 every day know that they can ask questions and get responses. Most important, of course, is that they are safe and feel safe.*

*At this point, all of the testing done to date confirm that there is no evidence of health hazards at Building 606 related to the Shipyard cleanup and restoration. It's good to see the test results come back so consistently. They affirm that the police employees are not at risk at the Shipyard. We will continue to work with the SFPD and Building 606 employees on any questions or concerns they have.*

*To summarize, the air, dust, water and soil testing agreed to in July are done. Highlights include:*

- *Settled dust tested in warehouse found no asbestos or lead*



- *Testing of the soil pile near the building found all radionuclides below the release criteria for the Shipyard cleanup set by the EPA*
- *The soil was tested for disposal, has been accepted by the landfill and will be removed*
- *The potable water testing found no radionuclides, pesticides, semi-volatile or volatile organic compounds*
- *Of two indoor faucets tested, lead was found in both. In one, in the shower room, the levels were above the federal action level. In the other, at a kitchenette sink, the levels were below. We are working with PUC on continued monitoring and testing. This is believed to be caused by the building's pipes, and not from the exterior water source. Meanwhile, staff are instructed to flush the water before drinking it, water filters are being added to the three sinks in the building, and bottled water will continue to be provided. The water is safe for showering, hand washing and dish washing.*
- *Air quality was previously tested and reported in September, with no findings of lead or asbestos.*

*What remains to be done:*

- *Testing of standing water in the crawl space – to be done when there is standing water*
- *Radiological health & safety screening of the interior and exterior of the building – expected in mid-January*
- *Continued potable water monitoring and evaluation*
- *Periodic indoor air monitoring*
- *Ongoing communication and information to B606 employees regarding Navy Shipyard*

Are the radionuclide levels included in this report? The PowerPoint you sent us mentions that "All radionuclide parameters were found to be below release criteria set by Navy, EPA, & CDPH" in the soil pile, but I don't see radionuclides in the EERG report. I see tests for VOCs, metals, PCBs, etc., but not radionuclides. I could be missing something?

*The radionuclides were analyzed in a separate report, which is attached.*

*Although the soil was analyzed for disposal, the additional radionuclides testing was done to learn more about the soil pile, and the findings are that the radionuclides are below the release criteria for the Shipyard cleanup. There is no exposure or risk to Building 606 employees from the soil pile, and it will be removed shortly.*

Also, can you tell us exactly which health-based standards you are applying to all of these test results -- air, soil, radionuclide, and water? The health-based standards don't appear to be listed in the reports.

*In each case these elements were tested and not found to be at levels to cause public health concern, therefore there is no health risk to the employees at Building 606. The summary above and the slides presented on Dec 10 provide information on how each element was considered.*

Additionally, I've been looking at the PUC water test results for 606 and it appears that in some samples there are levels of certain analytes in the water above the EPA and state Maximum Contaminant Levels, including arsenic and a number of VOCs. What does the health department

mean on page 9 of the PowerPoint where it says "Not Detected: Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Radionuclides, and Pesticides"? From the results column, it appears that some analytes that aren't found in normal San Francisco PUC water are not only detected in the Building 606 water (i.e. there's a measured level above the detection limit that is given in the report) but the levels in some cases are above federal and state MCLs.

*We reviewed all the PUC data and there were no exceedances within the Shipyard or Building 606 sources. The only lab report that showed any exceedances of the MCL (>MCL) was the report labeled FEBCO, which is the main SFPUC supply on Crisp Road that provides pre-filtered water to HPS/Bldg. 606. Those exceedances were: Iron (Fe), Aluminum, (Al), Manganese, (Mn). Those levels did not appear again in the Shipyard or Building 606 locations tested.*

*Lead (Pb) was detected in one sample inside Bldg. 606 at 31ug/L (31 ppb), in the men's first floor shower room, which is above the Action Level of 15 ppb. At the second floor kitchen sink lead was detected at 11ug/L (11 ppb), which is below the action level.*

The Powerpoint says, "Lead was detected below the Action Level in the 2nd floor kitchen," but in the report titled "PoliceCommission121218-BLDG6062ndFLRm201kitchen.pdf," which I assume is the results for the second floor kitchen, there are two samples with lead readings **above** the 15 ppb action level -- one lead level is 31 ppb and the other is 34 ppb.

*This confusion appears to be from your mis-reading of the lab results. Both the 31 ppb and the 34 ppb levels you reference are part of the lab's quality control and not actual readings from the building itself.*

*If you look at the key on page 14, those are labeled LCS and SPK – which are laboratory controlled samples and not readings from the building sample. The lead reading on page 1 is the actual finding from the building itself. Pages 1-3 represent the actual sample data from the location and the remaining pages are the quality control standards and not sample results.*

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]

**Sent:** Friday, December 14, 2018 9:13 AM

**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>

**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>

**Subject:** Re: report on 606 tests?

Can you send us the EERG radionuclide results today? Thanks.

---

**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 5:18 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

Can you add another question to the hygienists?

The Powerpoint says, "Lead was detected below the Action Level in the 2<sup>nd</sup> floor kitchen," but in the report titled "PoliceCommission121218-BLDG6062ndFLRm201kitchen.pdf," which I assume is the results for the second floor kitchen, there are two samples with lead readings **above** the 15 ppb action level -- one lead level is 31 ppb and the other is 34 ppb.

---

**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 4:04 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

Ok, thanks:

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 4:03 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

I will follow up with the industrial hygienists on these questions. I don't have that level of detail myself.

Thanks,  
Rachael

---

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Thursday, December 13, 2018 3:37 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Thanks. Are the radionuclide levels included in this report? The PowerPoint you sent us mentions that "All radionuclide parameters were found to be below release criteria set by Navy, EPA, & CDPH" in the soil pile, but I don't see radionuclides in the EERG report. I see tests for VOCs, metals, PCBs, etc., but not radionuclides. I could be missing something?

Also, can you tell us exactly which health-based standards you are applying to all of these test results -- air, soil, radionuclide, and water? The health-based standards don't appear to be listed in the reports.

Additionally, I've been looking at the PUC water test results for 606 and it appears that in some samples there are levels of certain analytes in the water above the EPA and state Maximum Contaminant Levels, including arsenic and a number of VOCs. What does the health department mean on page 9 of the PowerPoint where it says "Not Detected: Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Radionuclides, and Pesticides"? From the results column, it appears that some analytes that aren't found in normal San Francisco PUC water are not only detected in the Building 606 water (i.e. there's a measured level above the detection limit that is given in the report) but the levels in some cases are above federal and state MCLs.

thanks,  
Jason

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 3:07 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

[https://www.sfdph.org/dph/files/newsMediadocs/2018PR/HPNS\\_Crime\\_Lab\\_Analytical\\_Results.pdf](https://www.sfdph.org/dph/files/newsMediadocs/2018PR/HPNS_Crime_Lab_Analytical_Results.pdf)

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Thursday, December 13, 2018 2:13 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Rachael, can you send us the EERG report / results on the soil pile? It doesn't appear to have been included in the documents posted on the police commission site. Thanks.

---

**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 1:50 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

got it, thanks

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 1:18 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?



**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Wednesday, December 12, 2018 1:15 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Thanks.

---

**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Wednesday, December 12, 2018 1:10:12 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

We don't have a formal report, but I can send you the latest B606 update tomorrow morning. There will be a full report when all testing is completed.

Thanks,  
Rachael

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Tuesday, December 11, 2018 12:25 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** report on 606 tests?

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Rachael. We heard that the health department is issuing its report on recent tests at Building 606. When will this be released, and can you send us the document? Thanks.

--

Jason Fagone  
Reporter, San Francisco Chronicle  
[jason.fagone@sfchronicle.com](mailto:jason.fagone@sfchronicle.com)  
office phone: 415-777-6018

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Friday, November 30, 2018 4:54 PM  
**To:** Calvino, Maria Soledad; Franklin, William D CIV NAVFAC HQ, BRAC PMO;  
Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); McKinney, Kasheica (CII);  
juanita.bacey@dtsc.ca.gov  
**Cc:** LEE, LILY  
**Subject:** RE: SFDPH response to SF Chronicle

<http://www.sfexaminer.com/state-health-department-testing-finds-no-radiation-health-risks-shipyard-residential-area/>

Regarding Parcel A report by CDPH.

**From:** Kagan, Rachael (DPH)  
**Sent:** Friday, November 30, 2018 2:18 PM  
**To:** 'Calvino, Maria Soledad' <Calvino.Maria@epa.gov>; Franklin, William D CIV NAVFAC HQ, BRAC PMO  
<william.d.franklin@navy.mil>; Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR) <Jeff.Cretan@sfgov.org>; McKinney,  
Kasheica (CII) <kasheica.mckinney@sfgov.org>; juanita.bacey@dtsc.ca.gov  
**Cc:** LEE, LILY <LEE.LILY@EPA.GOV>  
**Subject:** SFDPH response to SF Chronicle

Here is a response sent to the SF Chronicle today:

Jason and Cynthia,

The statement regarding Amy Brownell sent to you on 11/21/18 remains applicable. Ms. Brownell has applied her expertise and dedication to the project for some 25 years, and has contributed to the City's understanding of the technical and scientific aspects of the work.

In addition, you probably saw that the CDPH final update on the Parcel A-1 scan came out on November 16: [www.cdph.ca.gov](http://www.cdph.ca.gov)

The attached EPA Fact Sheet also addressed the safety of Parcel A.

The San Francisco Department of Public Health continues to stand with the community. We have no other agenda. We support all efforts to ensure that Parcel A residents feel safe and are safe, including providing them with information, and supporting the additional scanning and testing by the California Department of Public Health. We have an ongoing commitment to work with the Parcel A residents, State Health Department and the EPA to ensure that Parcel A is safe for current and future residents and workers.

The recent Final Progress Update by the California Department of Public Health of the Radiation and Safety Scanning of Parcel A-1 found no health or safety risks to residents.

The Parcel A transfer in 2004 was verified by multiple federal and state agencies, in accordance with federal law, and there is no evidence of any exposure or harm to anyone on Parcel A. It is not fair to the community to stoke fear or speculation.

We are not invested in any outcome except for the health and safety of San Franciscans. When and if there are problems that arise, those need to be studied and verified so that all of the agencies involved can act on them to ensure the health and safety of the community.

The entire Hunters Point Shipyard cleanup and restoration is strictly regulated by the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). It requires the Navy to take all remedial action to protect human health and environment before it transfers the property. The work is overseen by US Environmental Protection Agency (EPA), California/EPA Department of Toxic Substances Control (DTSC) and the San Francisco Bay Area Regional Water Quality Control Board (SFRWQCB). As each parcel is complete, the Navy writes a Finding of Suitability for Transfer that all three regulatory agencies must concur with before the land is transferred to the San Francisco Office of Community Investment and Infrastructure (OCII). At the Hunters Point Shipyard, Parcel A has undergone that process and been transferred.

-Rachael Kagan

## Cretan, Jeff (MYR)

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**From:** Barnes, Maximilian (CII)  
**Sent:** Wednesday, November 28, 2018 4:31 PM  
**To:** Cretan, Jeff (MYR); Lynch, Andy (MYR)  
**Subject:** OCII Draft Press Release Parcel A - HPS  
**Attachments:** 11.29.18 Parcel A-1 testing complete.docx

Hello Jeff and Andy,

Please find attached the draft press release OCII plans on issuing tomorrow regarding the California Department of Public Health's scan of HPS Parcel A-1, pending any edits.

Give me a call if you have any questions.

Thank you,  
Max



**Max Barnes**  
**Project Associate/ Media & Public Relations**

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🐦 [@SFOCII](https://twitter.com/SFOCII)

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## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Wednesday, November 21, 2018 5:19 PM  
**To:** Cretan, Jeff (MYR)  
**Subject:** FW: questions from the SF Chronicle about water quality at Building 606

[A blow to my optimism...](#)

---

**From:** Fagone, Jason [mailto:Jason.Fagone@sfchronicle.com]  
**Sent:** Wednesday, November 21, 2018 3:32 PM  
**To:** Kagan, Rachael (DPH) <rachael.kagan@sfdph.org>; Dizikes, Cynthia <CDizikes@sfchronicle.com>  
**Cc:** Stevenson, David (POL) <david.c.stevenson@sfgov.org>  
**Subject:** Re: questions from the SF Chronicle about water quality at Building 606

Also, Rachael, just FYI -- going on background or off the record requires both sides to agree on the terms -- the source and the reporter. So in the future, if you simply state in an email to us that something is on background or off the record, we will consider those comments on the record. We are happy to negotiate background or off-record comments if it's a back-and-forth and we can agree.

thanks  
Jason

---

**From:** Fagone, Jason  
**Sent:** Wednesday, November 21, 2018 3:20:24 PM  
**To:** Kagan, Rachael (DPH); Dizikes, Cynthia  
**Cc:** Stevenson, David (POL)  
**Subject:** Re: questions from the SF Chronicle about water quality at Building 606

Thanks for this, Rachael and David. We'll have some follow-up questions next week, after the holiday.

take care  
Jason

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Wednesday, November 21, 2018 3:12:09 PM  
**To:** Fagone, Jason; Dizikes, Cynthia  
**Cc:** Stevenson, David (POL)  
**Subject:** RE: questions from the SF Chronicle about water quality at Building 606

11 21 18

Jason and Cynthia,

In response to your questions, the DPH Occupational Safety and Health team reviewed the emails and we also consulted with the SFPD, and they are in accord with this response. I have included my colleague, David Stevenson, above.

We continue to work together with the SFPD to respond to employees' requests at B606 and to provide ongoing information and communication. We are glad to do so, and are pleased that the safety of the building has been reaffirmed each time. The health and safety of the occupants of Building 606 is our top priority.

**NOTE:** In July 2018, the DPH and SFPD agreed with SFPD employees to re-test the water in Building 606. The PUC conducted an initial round of retesting of the building's potable water supply, including the water filtration system, in August. Comprehensive testing followed in September, and all results are expected in December.

**Question:** "Why did Wells write in 2010 that the department "never recommended bottled water" when she clearly did recommend bottled water to a police captain in 2007?"

**Answer: 05/20/2010 Email from Vickie Wells to Amy Brownell at DPH:**

*The 5/20/10 email to Ms. Brownell restates what was written in the 11/20/2007 email to Captain Fotinos. Ms. Wells was explaining to Ms. Brownell that the decision to have bottled water was the result of an agreement between the POA and the "City" (the party to the agreement regarding bottled water at Bldg. 606 with the POA was actually SFPD.)*

*Ms. Wells recommended that the SFPD continue to honor that agreement for the reasons she stated, primarily having to do with continuing a courtesy to staff, and that, because the building had fewer employees in it, the water may not be used as often, and the flushing issue previously identified may recur. She did not state that bottled water was necessary for safety reasons, nor was DPH a party to the agreement between SFPD and POA. This email was a professional communication between Ms. Wells and Captain Fotinos.*

**Question:** "Why didn't the 2010 PUC test examine the contaminants that Wells had flagged earlier---hydrocarbons, trihalomethanes and lead?"

**Answer: 2010 Water Sampling Report: Clarification and Discussion**

*A clarification must be made regarding the 4/27/10 report provided by the San Francisco Public Utilities Commission (PUC). The report provided sample results collected from the **source** (University Mound System in SF) of water provided to the Hunter's Point Naval Shipyard (HPS) including Bldg. 606 rather than from Bldg. 606. Sample results indicate that water supplied to HPS by the PUC met the United States Environmental Protection Agency (EPA) requirements for drinking water quality. These results, as well as the sample results from Bldg. 606 collected in 1999 indicate that contaminants of concern were not detected at Bldg. 606 in 1999 or in the University Mound source in 2010.*

**Question:** "Why is the department still referring to the 1998 water tests as proof of safety when Well's position in 2007 was that those tests proved the bottled water should be continued at Building 606?"

**Answer:** As stated above, Ms. Wells did not tell Captain Fotinos in 2007 that the Building 606 water was unsafe. There was another test in 1999 that indicated that contaminants of concern were not detected at Building 606.

(Also, we aren't sure why you are stating that the department referred or is "still referring" to 1998 water tests as proof of safety at Bldg 606, can you clarify that? But the answer above should cover your question.)

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Monday, November 19, 2018 4:05 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** questions from the SF Chronicle about water quality at Building 606

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Rachael,

Attached are two emails provided to us by SFDPH through a records request. Both were written by Vickie Wells, former chief of the Occupational Safety and Health section. Also attached is a brief 2010 report of a water test at Building 606. We have some questions about these emails and the water test, for a news story that we are working on.

The first email is from 2007. Wells writes to a SF police captain telling him that Building 606 employees should continue to drink bottled water as opposed to the building tap water. She justifies the opinion in part by pointing to 1998 water tests that showed one or more hydrocarbon compounds in the drinking water, as well as trihalomethanes and lead. "I would strongly recommend that bottled drinking water be retained for Bldg 606 at Hunters Point," she concludes.

The second email is from 2010. In this email, Wells denies ever telling the police that they should use bottled water. She writes, "We never recommended bottled water. This was part of the agreement between the City and the POA. My guess is now that there is no uniformed staff at Bldg 606 the PD is trying to get rid of the bottled water. We are not the approve but contact for discussing potability of water at Hunters Point. That would be the PUC."

Wells also writes in 2010 that the PUC did a recent water test at 606 and it showed the "water was fine." The water test appears to show that iron, copper, coliform bacteria and a few other analytes were tested, but it does not appear that the actual contaminants referenced earlier by Wells -- hydrocarbons, trihalomethanes and lead -- were tested.

We understand that Wells is retired, but she was chief of OSH at the time and setting policy for the department. Also, according to the department's recent PowerPoint about current testing activities at Building 606, the department is still claiming that the 1998 tests showed that the water was drinkable, because problems were solved by the flushing of pipes. But this was clearly not Wells's position in 2007.

Our questions, based on these records:

-- Why did Wells write in 2010 that the department "never recommended bottled water" when she clearly did recommend bottled water to a police captain in 2007?

-- Why didn't the 2010 PUC test examine the contaminants that Wells had flagged earlier -- hydrocarbons, trihalomethanes and lead?

--Why is the department still referring to the 1998 water tests as proof of safety when Wells' position in 2007 was that those tests proved the bottled water should be continued at Building 606?

We need answers to these questions by the end of the day Friday this week.

thank you

Jason and Cynthia



## Cretan, Jeff (MYR)

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**From:** Calvino, Maria Soledad <Calvino.Maria@epa.gov>  
**Sent:** Wednesday, November 21, 2018 2:20 PM  
**To:** Franklin, William D CIV NAVFAC HQ, BRAC PMO; Kagan, Rachael (DPH); Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); McKinney, Kasheica (CII); juanita.bacey@dtsc.ca.gov  
**Cc:** LEE, LILY  
**Subject:** EPA response to Inside EPA

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FYSA – Below is a series of responses that EPA sent to Inside EPA last week.  
Thanks!

**Question:** I was wondering if Region 9 can comment on a report issued last week (dated Oct. 18) by the Committee to Bridge the Gap. It's the third in a series on Hunters Point, and is titled: Hunters Point Shipyard Cleanup Used Outdated and Grossly Non-Protective Cleanup Standards. See:

<http://committeetobridgethegap.org/wp-content/uploads/2018/10/HuntersPtReport3CleanupStandards.pdf>

It says the Navy used outdated cleanup standards -- both building PRGs and soil PRGs -- at the site, rather than EPA's updated PRG calculators to establish and evaluate cleanup standards. EPA has told the Navy to use the updated versions, but the Navy has not.

**EPA Response:** The original cleanup standards did consider EPA PRG Calculator risk estimates that were current at that time. As we would do at any Superfund site, EPA has stated that the site testing and cleanup, including retesting of previous radiological work, must meet cleanup standards that are demonstrated to be protective using EPA's current risk evaluation tools. As part of its Five-Year Review, which is standard for any Superfund site that has waste remaining on-site, the Navy is now evaluating existing radiological cleanup standards using the current EPA PRG Calculator. This process requires a thorough, detailed, technical review which the Navy and EPA are currently doing.

Any concerns about cleanup standards or data falsification would not impact the health of current residents in Parcel A or the surrounding community. The areas under question are enclosed under protective covers (such as pavement, clean soil, or building foundations) or inside locked buildings in secured parts of the site outside of Parcel A (the residential area). Independent radiological monitoring of dust, groundwater, ground surfaces, and fence lines have shown that health-based standards are met, and independent third-party contractors routinely conduct in-person observations of current radiological cleanup work. **The public is not at risk while the evaluation and retesting proceeds.**

**Question:** In addition, the authors of the report ran EPA's PRG and BPRG calculators for the site, finding that they far exceed risk levels deemed acceptable by EPA under CERCLA.  
**Could you respond to these findings?**

**EPA Response:** The EPA recommends using its Preliminary Remediation Goals (PRG Calculator) online tool to estimate risks under different scenarios. The report used default assumptions in the risk model. The EPA Users Guide stresses the importance of using site-specific parameters in the PRG Calculator, as opposed to default parameters that may not reflect likely exposures and can provide misleading results. When the Navy provides its draft analysis in the next draft version of the Five-Year Review, EPA and other regulatory agencies will provide review and comments regarding the

acceptability of the analysis.

**Question:** Also, given the Navy has not heeded EPA's advice to use updated PRG calculators/ levels, instead using a building guidance document (AEC guidance document) dating back to the 1970s that was based on detection capabilities at the time, and a 27-year old soil PRG, does EPA plan to take any action to compel the Navy to change its calculators and cleanup levels? What recourse does EPA have? Is EPA allowing the military to do this same thing elsewhere?

**The report contends that the Navy is violating Superfund law by using outdated calculators. Do you agree?**

**EPA Response:** As stated previously, the Navy is currently evaluating its radiological cleanup standards using the current version of the EPA PRG Calculator. EPA expects that similar evaluations should occur at any Superfund site as part of the standard Five-Year Review process, using site-specific parameters, in accordance with EPA national guidance.

**Soledad Calvino**

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U.S. Environmental Protection Agency | Region 9  
[calvino.maria@epa.gov](mailto:calvino.maria@epa.gov)  
Office 415.972.3512 | Mobile 415.697.6289

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Wednesday, November 21, 2018 11:07 AM  
**To:** Cretan, Jeff (MYR)  
**Subject:** FW: San Francisco Chronicle Interview Request

Hi Jeff,

We have several questions from the Chronicle right now about the Shipyard. This email thread reflects the most recent question and answer. I will continue to keep you in the loop as I answer the remaining questions.

Please let me know if you have any concerns or would like to discuss.

Thanks, and Happy Thanksgiving!

Rachael

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**From:** Kagan, Rachael (DPH)  
**Sent:** Wednesday, November 21, 2018 11:02 AM  
**To:** 'Dizikes, Cynthia' <CDizikes@sfchronicle.com>  
**Cc:** Fagone, Jason <Jason.Fagone@sfchronicle.com>  
**Subject:** RE: San Francisco Chronicle Interview Request

Hello,

OK, I rearranged the order based on your request.

Amy Brownell is on Thanksgiving holiday, but I was able to check in with her yesterday and with the City Attorney on your question.

Reading over the emails, we are baffled by the suggestion of conflict of interest. I don't know what conflict you or your unnamed sources are alluding to.

Isn't it good that people with questions can contact the Health Department?

Here is a statement from the Health Department you may use for attribution. The comments above are on background.

*Amy Brownell is a public servant who was responding to inquiries from members of the public seeking information from the Department of Public Health. Her answers were factual, objective and contained public information. They contained the same information that we provide to any member of the public or the media. At no point did Brownell express an opinion about what the homeowners or potential homeowners should do. Brownell is a subject matter expert and it is appropriate for her to respond with the information she had available. Brownell also provided additional resources, so that the inquirers could seek out more information from other sources. Providing public information and expertise is responsive, and we fail to see how that is improper.*

Thanks,  
Rachael



**From:** Dizikes, Cynthia [<mailto:CDizikes@sfchronicle.com>]  
**Sent:** Tuesday, November 20, 2018 1:21 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Fagone, Jason <[Jason.Fagone@sfchronicle.com](mailto:Jason.Fagone@sfchronicle.com)>  
**Subject:** Re: San Francisco Chronicle Interview Request

Hi Rachael,

Thanks for getting back to us and understood about the air quality concerns. Can we prioritize our questions this way:

1. Parcel A questions
2. Water quality at B606 questions
3. Cancer questions

Thanks again,

Cynthia and Jason

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**From:** "Kagan, Rachael (DPH)" <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Date:** Tuesday, November 20, 2018 at 1:07 PM  
**To:** "Dizikes, Cynthia" <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Cc:** "Fagone, Jason" <[Jason.Fagone@sfchronicle.com](mailto:Jason.Fagone@sfchronicle.com)>  
**Subject:** RE: San Francisco Chronicle Interview Request

Hello,

I am not familiar with this issue, and will look into it.

We are currently working on two other requests from you, and multiple media requests on air quality.

It is a busy week, and we are closed Thursday and Friday.

I will not be able to address all of these questions in such a compressed time period. I was working on them in the order they were received:

- 1- Cancer questions
- 2- Water quality at B606 questions
- 3- Parcel A questions

Until we have reviewed question #3, I can't estimate when we will respond. But I will let you know as soon as I can.

Thanks,  
Rachael

**From:** Dizikes, Cynthia [<mailto:CDizikes@sfchronicle.com>]  
**Sent:** Tuesday, November 20, 2018 11:50 AM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Fagone, Jason <[Jason.Fagone@sfchronicle.com](mailto:Jason.Fagone@sfchronicle.com)>  
**Subject:** San Francisco Chronicle Interview Request

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Hi Rachael,

We recently received a records request back from SFDPH (see attached) that includes some back-and-forth between Amy Brownell and potential homebuyers on Parcel A. We spoke to some ethics and legal experts about these exchanges, and they said that Brownell has a conflict of interest here. Lennar sales agents were referring their clients to Brownell while the homes were under contract. But her job is to scrutinize the cleanup and stakeholders like Lennar, not get involved in private real-estate transactions and give broad assurances about the safety of the shipyard.

We're working on a story and were hoping you could put us in touch with her today to talk more about this. Please let us know when might work for her and thank you for your time,

Cynthia and Jason

## Cretan, Jeff (MYR)

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**From:** Stevenson, David (POL)  
**Sent:** Friday, November 09, 2018 6:37 AM  
**To:** Cretan, Jeff (MYR)  
**Cc:** Hussey, Deirdre (POL)  
**Subject:** Fw: SF let shipyard cops work amid tons of toxic dirt, told them they were safe - San Francisco Chronicle

Jeff, I'm sure you've seen the article. Much of it focuses on DPH's response. Below is the statement we've provided to the Chronicle and the one or two media outlets who tried to piggyback on the paper's reporting earlier this summer. Command staff and I are on a retreat this morning but will discuss possible further steps.

The San Francisco Police Department is committed to providing safety with respect for the public we serve and our SFPD members. The Chronicle's questions regarding Building 606 focus on concerns and potential issues dating back over the last two decades. These concerns and potential issues were documented, distributed to appropriate command staff members and stakeholders, and promptly addressed. In collaboration with the San Francisco Department of Public Health, an industrial hygienist has been in place for more than two decades at the site to investigate potential issues. As clearly documented in numerous memos and email correspondence, guidance was provided to Department members over the last two decades regarding any possible health or operational issues at Building 606.

The safety and well-being of our hardworking, dedicated San Francisco Police Department members is paramount, and the Department of Public Health has consistently assured SFPD that Building 606 is safe for the men and women who work there. SFPD command staff and DPH leaders met with Building 606 workers to hear and address any questions and concerns. The SFPD and DPH will take the following steps to address those concerns:

- Provide a timeline for the removal of residual soil behind Building 606 excavated for a new sewage tank
- Facilitate testing of Building 606's potable water supply
- Facilitate air quality testing in Building 606's air vents and warehouse
- Facilitate increased testing of the water filtration system that feeds the Forensic Lab's shooting tank
- Test any standing water beneath Building 606
- Distribute ongoing results of U.S. Navy soil testing and asbestos monitoring in Parcel A

<https://www.sfchronicle.com/bayarea/article/SF-let-shipyard-cops-work-amid-tons-of-toxic-13375196.php>



SF let shipyard cops work amid tons of toxic dirt, told ...

[www.sfchronicle.com](http://www.sfchronicle.com)

At the time, Fong, a San Francisco police officer, was one of more than 100 police employees stationed at Building 606, a warehouse in the former Hunters Point Naval Shipyard.

## Left in the dirt

As tons of toxic soil piled up around them, San Francisco assured the cops at Hunters Point shipyard they were safe. But the city never knew, and still doesn't.

By [Jason Fagone](#) and [Cynthia Dizikes](#)

### Chronicle Investigation

Lewis Fong didn't know what was happening next to his office building in summer 2007, only that it involved a lot of dirt.

Amid charges of fraud and mismanagement in the cleanup of San Francisco's toxic shipyard, The Chronicle is interviewing people who worked there and digging into public records, trying to determine what happened and why. Read more of our Dangerous Ground reporting [here](#).

"Just dirt," Fong recalled recently. "Mounds and mounds." The dirt sat in a giant yard surrounded by a chain-link fence. Trucks kept dumping soil inside, spewing clouds of dust, "truck after truck."

At the time, Fong, a San Francisco police officer, was one of more than 100 police employees stationed at Building 606, a warehouse in the former Hunters Point Naval Shipyard. The city has leased Building 606



from the Navy since 1997, using it as a training base and headquarters for units that require a lot of space (SWAT, K-9, the crime lab). Although the shipyard is a Superfund site, contaminated with radioactive materials and other toxins, the city has always assured police it is safe to work there.

Fong trusted the city. In 2007, he'd been accepted into the Honda Unit, a prestigious squad of cops on light motorcycles, and when his training began at Building 606, he was more worried about falling off a bike than breathing dust from the mysterious yard next door. "You're just stressed out from being trained, so you don't notice what's out there," he said.



Soil covered under tarps after processing at a radiological screening yard at Hunters Point Naval Shipyard on Jan. 3, 2007.

| PAUL SAKUMA / AP

Fong and the other cops may not have understood what was going on next to their office, but the city did. The area was a “radiological screening yard,” one of the most hazardous locations on any Superfund site — a place that processes large amounts of contaminated soil. And it was managed by Tetra Tech, the Navy contractor now at the center of a ballooning scandal over falsified and suspect shipyard cleanup records.

Officials with the city health department had known about the yard for some time, according to emails and memos recently obtained by The Chronicle through a public records request. About two months before the yard opened, an industrial hygienist with the health department questioned whether the yard would pose a danger to the employees in Building 606, potentially exposing them to unsafe levels of radioactivity. “What would happen if we found an exposure?” Karen Heckman wrote in an email to her boss on May 24, 2007.

The danger was dust. Radioactive dust.

The yard was a place where Tetra Tech brought soil from tainted areas of the shipyard, dumped it on “pads” and examined it for long-lasting radioactive elements dating to the Cold War. Some of the radioactive substances were birthed by a pair of plutonium-bomb tests in 1946 that went horribly awry, contaminating hundreds of gathered ships. Jonathan Weisgall, who wrote the definitive book about those tests, called it “the world’s first nuclear accident.” Seventy of those highly radioactive ships then carried that disaster back to Hunters Point, spreading unfissioned particles of the bomb core itself (plutonium-239) as well as hazardous substances forged in the sun-like fires of the explosions (strontium-90, cesium-137).



Navy crews swab the deck of the Prinz Eugen in an attempt to reduce radiation levels after “Shot Baker,” the July 25, 1946 underwater detonation of a plutonium bomb at Bikini Atoll in the Marshall Islands. Dozens of vessels were hopelessly contaminated by gigantic radioactive waves and a curtain of poisoned mist.

| U.S. Naval Institute 1946

The soil that now was being piled next to the police might have contained any of these substances, as well as radium-226, which the Navy once used in large quantities to make signage glow in the dark. The risk to city employees at Building 606 was real — and invisible. Plutonium emits



alpha particles, which are easily stopped by a piece of paper or the skin. But just one-millionth of an ounce of plutonium-239 breathed into the lungs will cause cancer with almost 100 percent certainty, according to a 1992 study by a group of international physicians and energy experts. Cesium-137 and strontium-90 are also dangerous if inhaled or ingested, able to irradiate the body from the inside.

With the shipyard's brisk winds, radioactive particles in the soil were likely to go airborne, and if anyone inhaled dangerous levels of radioactivity, they could get cancer years later and die. Recognizing this risk, the health department told police commanders it would monitor the air next to Building 606.

But records show that the health department wasn't capable of verifying the cops' safety. The agency didn't gather air data of its own, and though it asked Tetra Tech and the Navy to provide air-monitoring reports, these requests were deflected or ignored.

Tetra Tech belatedly gave the city a single snapshot of air samples for a six-week period in the summer of 2007. The firm never provided any information after that.

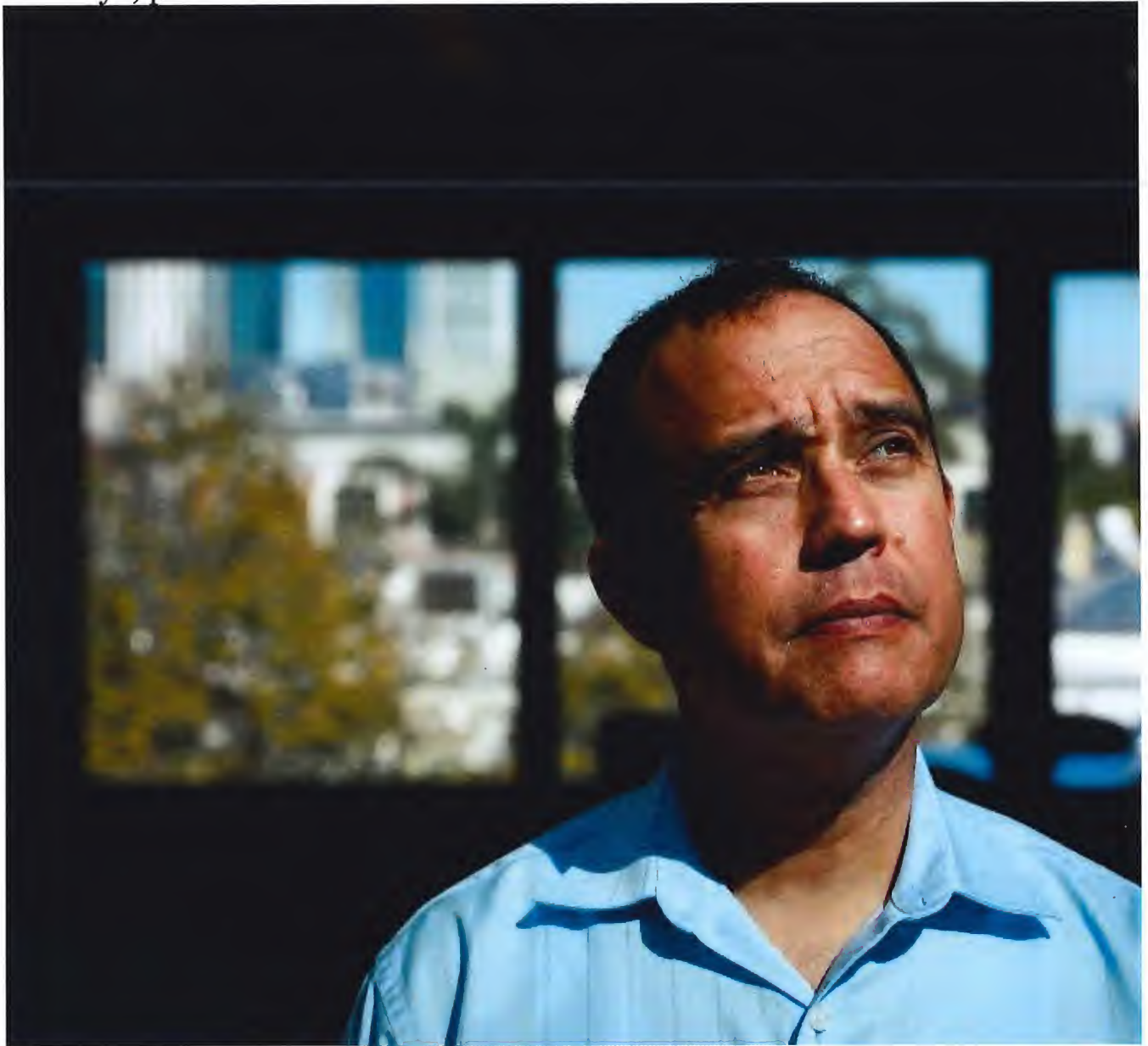
Even if the company had sent the city more data, it wouldn't have protected the police, because there was a more fundamental problem. According to an analysis of public records and an expert consulted by The Chronicle, the air safety standards at the yard — set by the Navy and approved by the U.S. Environmental Protection Agency — were profoundly inadequate, allowing police and members of the public to breathe potentially dangerous levels of airborne radioactive particles. The radiological screening yard next to the police closed sometime around 2012, but two smaller screening yards continued to operate nearby for several years. The city didn't monitor those, either. As a result, for all the years these yards were running, the city had no way of determining what radioactive particles might have been in the air near Building 606, or at what levels. And according to experts and shipyard whistle-blowers, this means that police may have been exposed to dangerous levels of radioactivity.

The employees in Building 606 never knew. No one ever told them that hazardous radiological work was going on right next door.

"All that time I was out there, we didn't hear shit," said Richard Tong, a former Honda Unit officer at Building 606.

"If these allegations are true, we would be deeply troubled about the conditions to which police officers, including myself, were exposed, and

an apparent total disregard by city officials for their safety,” said Tony Montoya, president of the Police Officers Association.



Tony Montoya, president of the S.F. Police Officers Association, was diagnosed with a brain tumor two years ago after working at Building 606.

| Gabrielle Lurie / The Chronicle

Montoya, 51, was stationed at 606 as a K-9 officer from 2005 to 2008. Eight years later, doctors diagnosed him with a cancerous brain tumor that required emergency surgery. “It was like a kick to the gut,” he said. Like other officers who have become sick since working at the shipyard, Montoya now wonders if there’s a connection. “It’s anybody’s guess,” he said.





Tony Montoya, president of the S.F. police union, shows the scar on his head and neck from the brain surgery after he was diagnosed with a tumor.

| Gabrielle Lurie / The Chronicle

The poor or nonexistent monitoring of air quality at the shipyard isn't just an issue for city employees who work there. In the neighboring Bayview-Hunters Point community, where a child can expect to live an average of [14 years less than a child in well-off Russian Hill](#), residents have complained for years about dust that blows from the shipyard. The same potentially toxic air that police breathed for years could have affected those neighbors too, as well as artists who have long rented studios at the shipyard.

And the same flawed air-quality rules from years ago are still in effect at the shipyard today, affecting the air that San Francisco residents are breathing now and will be breathing for years to come.

In response to questions from The Chronicle, government agencies involved in the shipyard cleanup insisted that police and members of the public are protected by Navy procedures for controlling dust.

Today, the city still leases Building 606; the police department's crime lab remains there, along with 40 public employees. [A previous Chronicle report outlined other potential health risks at the building](#), including high levels of lead in the tap water and radioactivity in the surrounding soil. In response to that story, the city said it would perform tests of the tap water, air and soil; results are expected later this year.

In the meantime, the health department, which is supposed to serve as a watchdog and advocate for the public at the shipyard, continues to say that people who work at the building and members of the public are safe. But the new records call the department's credibility into question.

Throughout the multidecade history of the cleanup, the department has told many groups with a stake in the shipyard not to worry about toxic exposure: The Bayview-Hunters Point community. Artists. Visitors. Homeowners. Supervisors. Mayors. "To my knowledge there has never been a case where we felt that health and public safety was at risk," the department's point person on the cleanup, Amy Brownell, told city supervisors in May.

But in the case of Building 606, at least, this is a statement of faith, not science. A true scientific analysis would require data that the city never gathered.

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Tamara,

You may want to have Mike continue to pursue the request for data. I've ne  
this to him at the meeting today, but unless there gets raised to level of Ralph  
respond.

-Karen

"I've never heard anything back from Bill," Karen Heckman wrote.



Bill was Bill Dougherty, Tetra Tech's top official at the shipyard. Throughout 2007, Heckman repeatedly tried to get information from him about any airborne radioactivity next to the police building. She needed it to do her job. Ever since police units were transferred to the shipyard in 1997, the health department has played a key role in monitoring their safety. In April 2007, Heckman's superiors asked her to study plans for Radiological Screening Yard 2 (RSY2), the new soil-processing facility that was scheduled to begin operating next to Building 606 in July.



Left: Flooding of areas surrounding RSY2, the radiological screening yard next to the police building. Right: An air monitoring station near the south pier of the Hunters Point Shipyard, October 7, 2010.

| LF: Bert Bowers RT: Courtesy U.S. Navy / Bert Bowers And U.S. Navy Heckman met with Dougherty, who explained the yard's dimensions and function. In an email, Heckman relayed the information to her bosses. The yard would be "quite large," she wrote, "covering the asphalt area to the East of bldg 606 and extending all the way out the pier" — a 13-acre footprint. Tetra Tech would eventually install 37 soil pads there, each 1,000 square meters, covering about 9 acres, an area more than three times the size of the field at AT&T Park.

Karen Heckman/DPH/SFGOV

05/24/2007 03:47 PM

To Vickie Wells/

cc Tamara Davi

Subject Re: Radiation

Vickie,

I agree that we should have a meeting to discuss options at HP. the site visit on April 4th, the remediation contractor, Tetra Tech, soon to be constructed soil remediation pad yard, adjacent to Bldg 606. The area is quite large, covering the asphalt area to the East of the pier. There will be 100 pads\* on the site, each about 1000 square inches. The soil in each pad will be filled, leveled, monitored and dust generation will be controlled by water spray.

Tetra Tech has ambient air monitoring done upwind and downwind throughout the day.

\* "100 pads" was an error; the yard included 37 soil pads

Dougherty also told Heckman he thought "the most contaminated areas" at the shipyard "have yet to be excavated and material from those excavations would be directed to the new pad yard," she wrote.

Indeed, over the next five years, Navy records show, Tetra Tech would bring more than 6,000 truckloads of soil there from some of the most radioactive portions of Hunters Point.

Heckman's email also noted that Tetra Tech planned to dig trenches around Building 606, pulling up old, contaminated storm drains and checking them for radioactivity. The potentially tainted soil from these trenches also would be screened at RSY2.

"At some point," Heckman pointed out, "building 606 will be surrounded by the remediation activity on three sides of the building."



# Contaminate

Starting in 2007, the  
stationed at Building  
The work involved un  
amounts of shipyard  
like radium, cesium, s

RST.

**RSY 4**

**Building 60**

■ Police building (606)  
and surrounding property

Her email ended with a list of questions for her supervisors, one asking point-blank: “Should the Police continue to operate Building 606 during the activity?”

Contacted by The Chronicle, health department spokeswoman Rachael Kagan described Heckman’s 2007 email as a standard form of due diligence, “part of her role as an SFDPH industrial hygienist.” Though Heckman still works for the department, Kagan would not make her available for an interview. Kagan added that monitoring the soil yards was never the health department’s job, and that it has never had “any regulatory authority over the cleanup process itself.”

But the department wields significant formal and informal power at the shipyard. Its Occupational Safety and Health section is charged with keeping city workers safe by eliminating “employee exposures to avoidable hazards.” Hygienists and environmental engineers can coordinate air or water monitoring. They often attend community meetings about the shipyard and Board of Supervisors hearings, explaining the convoluted cleanup process. And behind the scenes, department officials talk constantly with the Navy and other agencies involved with the shipyard, advocating “the best possible approaches to ensure community health and safety,” Kagan said.

In short, the department’s staffers are supposed to be the city’s experts on health issues. So it’s not surprising that in 2007 the department played a crucial role in deciding what to do about the radiation work around Building 606.

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Building 606, a warehouse at the former Hunters Point Naval Shipyard, once served as a headquarters for more than 100 police employees, and about 40 still work there today.

| Lea Suzuki / The Chronicle

First of all, someone at the city concluded that the police didn't need to be relocated. It's unclear who made that decision. But records show that in spring 2007 the health department went looking for a way to track the air quality next to Building 606, to make sure police weren't breathing harmful radioactive dust.

The department began by asking Tetra Tech to provide data from its air monitors at the yard. On May 31, 2007, Heckman sent Dougherty a letter. After a few weeks of silence, he eventually replied that he would

forward her request to the Navy, but she didn't hear anything else for a while.

Through his lawyer, Dougherty declined to comment for this story.

Meanwhile, Tetra Tech and the Navy moved forward. On July 19, 2007, the new soil yard lurched to life. A week later, according to a transcript of a community meeting, Dougherty and Navy officials described RSY2 as a boon to the cleanup.

"We're very proud of this," said Laurie Lowman of the Navy's Radiological Affairs Support Office, a unit based in Virginia that makes decisions about radioactive waste disposal at Navy sites.

"It's a beautiful screening yard, and it really increases our capacity significantly," she said. "We are rolling."

Lowman and Dougherty explained that they would control dust at the yard by spraying piles of soil with Rhino Snot, a bright-green fibrous material that forms a crust atop the dirt. They would also spray some areas and roads with water. However, they could spray only so much water, Lowman said, because the soil had to be dry to be screened.





An aerial view of the aircraft carrier Independence at anchor in San Francisco Bay in 1951. Damage from the atomic bomb tests at Bikini Atoll is visible. The ship, eventually scuttled in the waters off the Farallon Islands, was recently located by federal scientists.

| Courtesy S.F. Maritime National Park 1951

Navy documents show that in July 2007, during the first week of the yard's operation, Tetra Tech brought 76 truckloads of soil from a single trench in a contaminated area where sailors once sandblasted the hulls of radioactive ships brought from the Bikini Atoll plutonium-bomb tests. Plutonium-239 remains radioactive for hundreds of thousands of years.



If the soil brought to RSY2 contained plutonium, it was still emitting radiation — just yards away from the police.

Heckman, though, still couldn't get Dougherty to respond to her requests for RSY2 air samples. So she tried writing directly to the Navy.

"Can you provide the air sampling results, taken at the soil screening area, to me on a weekly basis?" she asked in an email to Ralph Pearce, a Navy project manager.

Pearce directed her back to Tetra Tech: "Please contact Bill Dougherty."



Paul Swiatko (left), Mel Bautista and Richard Tong, who were part of the San Francisco Police Department's tactical division, walk toward Building 606, where they used to work and train.

| Lea Suzuki / The Chronicle

New dirt kept arriving at the screening yard almost daily, according to Navy project records. Nine truckloads on Aug. 9. Nineteen truckloads on Aug. 10. Forty truckloads on Aug. 13.

The cops in Building 606 couldn't help but notice. RSY2 was very close, just across a wide street, and the dust from the yard was unavoidable, police said. A few of them saw the radiation warning signs on the fence, but that wasn't an unusual thing at the shipyard, where cops jogging in shorts and T-shirts would sometimes cross paths with Navy contractors in hazardous material suits.

But the city never told them that the yard had anything to do with radioactivity that could go airborne, police interviewed by The Chronicle said.

"No one explained that, for sure," Fong said.

"I would have headed for the hills," said Montoya, now the head of the police union.

Mark Madsen, then a SWAT Team member, assumed the yard was a construction area of some kind. "After a while, we couldn't really see what was going on back there, because they put up tarps," Madsen said. The tarps around the fence didn't stop the dust. It coated the cops' cars, motorcycles and clothes; it stuck to the fur of their K-9 dogs. Dirt bike cops remember tasting the grit in their teeth.

Many cops were worried. They may not have known what RSY2 was, but they knew they were working on a Superfund site with a radioactive history. Some wrote memos to their bosses, arguing it was unsafe for them to stay at Building 606. They were concerned about bringing hazards home to their families. They wanted to know about air testing. "We're not Rhodes scholars, but the little bells start going off," Montoya said.

Unknown to the police, the health department was still struggling to get air data from RSY2. In late August or early September 2007, after months of delays, Tetra Tech finally sent the city a snapshot of air samples collected between July 19 and Aug. 30. These data sheets were recently obtained by The Chronicle through its records request to the health department. Each sheet was a confusing grid of numbers and jargon. At the top of one, someone wrote a question that any member of the public might have: "What is this?"

By the end of the month, the health department claimed to have decoded the data. On Sept. 28, 2007, Vickie Wells, then director of Occupational



Safety and Health, sent a memo to a deputy police chief, saying the air data showed no elevated levels of radioactivity.



Daniel Hirsch, retired head of the UC Santa Cruz environmental and nuclear policy program, keeps boxes of research material in sheds on his property in Ben Lomond.

| Guy Wathen / The Chronicle

She was wrong to give that assurance, according to an academic expert consulted by The Chronicle. Reporters recently shared the data sheets with Daniel Hirsch, retired chair of environmental and nuclear policy at UC Santa Cruz and an expert on Superfund cleanups. Hirsch, who has [recently published several reports](#) that are critical of the shipyard cleanup, said the information was not sufficient to confirm the cops' safety.

“You cannot tell the police based on this that they are OK,” Hirsch said. “And frankly, the environmental people at the Department of Public Health should have caught this.”

For one thing, the reports appear to show few specific measurements of airborne alpha or beta particles, the types of radioactive substances that pose the most risk if inhaled. In columns labeled “% DAC alpha” and “% DAC beta,” the data sheets listed percentages and less-than signs instead of precise values.

More concerning, according to Hirsch, was the reference to “DAC.” DAC stands for Derived Air Concentration, a safety standard used for workers in the nuclear power industry, who are legally allowed to receive higher doses of radiation than the rest of the population — doses linked to significantly increased risks of cancer. According to the EPA’s shipyard rules, if the level of airborne contamination at a soil yard is less than 10 percent of the DAC limit, the air is safe for shipyard workers to breathe.

But the EPA’s rules are far more rigorous when it comes to protecting the rest of the population. For a cop at a Superfund site — or a crime-lab employee, or a member of the public — the EPA’s usual limits are up to 10,000 times stricter than what the agency allows for shipyard workers. While the DAC standard might have made sense for cleanup workers, Hirsch said, it wouldn’t have protected anyone else who might have breathed that air.

Asked why the EPA allowed such high limits for airborne contamination next to a busy city office building, agency spokeswoman Soledad Calvino said that dust-control measures by the Navy and Tetra Tech would have protected the police. She also shared details of a calculation performed by EPA staff, purportedly showing that the air was safe for police to breathe. The EPA performed this calculation recently in response to questions from The Chronicle, not years ago, when the soil yard was operating.

The calculation is based on a string of optimistic assumptions about the wind, the contents of the soil, the management of Tetra Tech’s soil yard and the way people at 606 spent their days. For instance, the EPA assumes that the wind mostly blew across RSY2 “in the opposite direction from Building 606,” and concludes that police were exposed to air from the yard for just 7.2 minutes per day. The EPA also claims that nearby soil pads processed soil for only 40 days per year. But the wind at Hunters Point is unpredictable, work at the soil yard took place year-

round and many cops trained outdoors for hours each day, multiple days per week. Also, the EPA calculation does not account for plutonium-239, a known contaminant at the shipyard that is toxic at lower levels than other radioactive substances.

Regardless of what Tetra Tech's air samples showed in summer 2007, the information the company gave to the city was only a snapshot. And the yard next to the police was in constant flux.

On Oct. 8, 2007, 10 days after the health department's Wells wrote the memo that told the deputy police chief not to worry, 44 new truckloads of potentially contaminated soil were dumped in the yard. The next day, 27 more truckloads arrived.

Operating in the dark, without current radiological data, city leaders kept telling the police they were safe. Hygienists tested the dust inside Building 606 for asbestos and heavy metals and reported nothing concerning. Airborne radioactivity wasn't mentioned.





Former S.F. Mayor and current California governor-elect Gavin Newsom (right) greets community members before a 2005 ceremony in which the Navy transferred 75 acres of the former Hunters Point Naval Shipyard to San Francisco.

| Eric Risberg / Associated Press 2005

On Oct. 16, 2007, the manager of the crime lab emailed four city employees, including a top deputy of then-Mayor Newsom, Michael Cohen, the city's chief negotiator on shipyard agreements and other large developments. The crime-lab manager said that vehicles at Building 606 were covered with mud ("the cars are a mess") and asked the city to



“bring a knowledgeable scientist out here to speak to us about environmental concerns/risks/exposures.”

Cohen replied the same day, copying the health department’s Brownell and three others. He suggested the department “set up a briefing for Crime Lab staff to help allay their dust fears.” He added, “Is there anything we can do to give staff car wash tickets or something?”

**Amy - can we work with Jim Mudge to set up a briefing for Crime**

**Patty - Is there anything we can do to give staff car wash tickets c**

**Michael Cohen  
Director, Base Reuse and Development  
Office of Economic and Workforce Development  
City Hall Room 410**

Cohen, now the principal of Strada, a private-equity firm that finances real estate development, told The Chronicle recently that he had “very little direct involvement with building 606.” A spokesman for Newsom, who was elected California’s governor Tuesday, said he “does not recall a discussion about Building 606.”

The day before the Nov. 28 “Informational Meeting” at Building 606, the city still didn’t have current air safety data from Tetra Tech. Yet when health department officials visited 606, they told the police that the air they were breathing was definitely safe.

“Air sampling data indicates exposure to contaminants is well within acceptable levels,” went a PowerPoint presentation authored by Wells. The talk did not mention radioactivity. Wells declined to comment for this story, and the health department did not make Brownell available for an interview.

“Is Bldg 606 Safe?” read the title of one slide in the presentation. Wells’ answer on the PowerPoint: “Yes.”



## DPH Occupational Safety and Health Presentation

Vickie L. Wells, MS, CIH, CSP  
Director, Occupational Safety and Health



### Is Bldg 606 Safe?

- Yes
- Regulatory agencies have approved lease of Bldg 606
- Air sampling data indicates that contaminant levels are well within acceptable levels

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In fact, the cleanup around Building 606 was spiraling out of control, according to former employees of Tetra Tech or its subcontractors, who have said the company repeatedly cut corners and failed to properly remove radioactive waste.

Seven of these people detailed their claims in recently unsealed whistleblower lawsuits against Tetra Tech and a handful of its subcontractors. Six of the plaintiffs also filed sworn statements last year with the Nuclear Regulatory Commission, the agency that licenses companies like Tetra Tech to perform radiological work.

Tetra Tech has said the whistle-blowers are lying. But some of their claims have already been confirmed by government investigations, and in late October the Department of Justice announced it was [joining the three whistle-blower suits against Tetra Tech](#), a rare move that allows the government to sue the company for fraud.

The whistle-blowers' stories boil down to this: The cleanup wasn't what it seemed. People in charge of the radiation surveys were not qualified to oversee them. People who were supposed to be managing tainted soil were releasing it into the air. Soil samples said to be from one place were actually from elsewhere. Control was an illusion.

The problems extended to areas next to the police building, according to multiple whistle-blowers who have alleged serious safety breaches at RSY2 that could have exposed anyone nearby to radioactivity.





Whistle-blower Archie Jackson, 54, stands in front of his home in Beech Island, S.C. Jackson is a radiation technician who used to work at the Hunters Point shipyard and says the cleanup was marred by incompetence and falsified records.

| Gerry Melendez / Special To The Chronicle

The Tetra Tech supervisor in charge at RSY2 didn't seem to know what she was doing, multiple whistle-blowers said. In their sworn declarations and lawsuits, they said the supervisor's inexperience had a direct impact on RSY2, turning the soil yard next to the police into a chaotic and potentially dangerous area. Archie Jackson, 54, said in a recent interview that he saw the supervisor's laborers performing sensitive tasks for which they had no training, like running radiation scans on the soil pads and operating the air-monitoring machines. Another technician, Art

Jahr, noticed the laborers “slinging soil around during sampling so as to create an airborne hazard,” and a third, Bert Bowers, said he sometimes discovered that machines at RSY2 and other soil yards were shut down because the gasoline generators that powered them had run out of fuel. In October 2012, during a routine quality check, the Navy noticed flaws in Tetra Tech’s soil measurements taken from an area close to Building 606, about 100 yards to the southeast. Because these inconsistencies might indicate bigger problems, the Navy asked Tetra Tech to investigate what went wrong.

The resulting report, sent to the city health department and other agencies in April 2014, concluded that Tetra Tech employees had collected faulty soil samples at multiple shipyard locations. Tetra Tech blamed employee error, not fraud, and said it had fixed all problems. The Navy signed off. And the city didn’t investigate further, records show. On internal email threads, the health department’s Amy Brownell downplayed the significance of the bogus soil samples. In one email, she wrote to a group of city shipyard consultants prior to a Navy conference call about the findings. “Please plan on being on mute and not asking any questions during the call,” Brownell wrote to the consultants. “Navy is trying to keep this as low key as possible.”

The purpose of the call, she said, was for other agencies to “get all their questions answered.” She added that if the consultants had concerns about the faulty soil samples, they could discuss after the call, but “based on everything I’ve heard — it is just a documentation issue at this point but it is sensitive because a contractor made an error — which then got fixed later.”

In another email, Brownell suggested that the effort to investigate the skewed data had been a waste of money: “your tax dollars hard at work...”

“As far as I’m concerned,” Brownell wrote in the same email, “for our purposes, this issue was a contractor error that has been corrected and has no implications for future.”

In a statement, department spokeswoman Kagan defended Brownell, saying she “has applied her expertise and dedication to the project for some 25 years.” As for Brownell’s 2014 reaction to the faulty soil samples, Kagan said, “It seemed then, based on the information we had, as though the issues were identified and being corrected.”

Instead, it was only the beginning of the problem — the first loose thread in a larger unraveling. Tetra Tech remained in business at the shipyard



and continued to perform radiological work next to Building 606 in 2014, digging up old storm drains and processing the soil.

By that time, Navy documents show, RSY2 had apparently closed, but Tetra Tech had built a pair of smaller soil yards a bit farther away from Building 606: RSY3 was about a fifth of a mile to the south, and RSY4 sat an eighth of a mile to the northwest.

The new yards also handled significant amounts of tainted soil. Although the health department told The Chronicle that these yards weren't a concern because they were farther away from Building 606, the fierce wind at the shipyard has a way of compressing distance.

Throughout 2014, the health department continued to tell employees at Building 606 that they weren't at risk. On April 21, Dougherty emailed Tetra Tech and Navy officials that a pregnant woman working at the police building had "raised concerns to her management" after noticing radiation-warning signs near the building. Fetuses are particularly sensitive to radiation. The Navy looped in the health department, and Brownell offered to meet with the woman, who apparently worked at 606's crime lab.

"In the past," Brownell emailed colleagues, "I have found the crime lab personnel very receptive to understanding the science and accepting of our assurances that there are no public health risks once we're able to explain the concepts to them."



Building 606 is reflected in the window of another shipyard building.

| Lea Suzuki / The Chronicle

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Today, due to the lack of oversight by the city and other agencies, it's difficult to know if police in Building 606 were exposed to harmful radioactivity. The only way is to look at the cleanup data: What was in the soil, at what levels? What was in the air?

But because of questions about fraud and mismanagement, the data can't tell the story. In the past year, the Navy and EPA have said they found signs of possible fraud in soil and building measurements across much of the shipyard, including the soil yards near the police, and, according to the whistle-blowers, the company's air monitoring was flawed as well. (Tetra Tech disputes the EPA and Navy analyses.)

“It’s impossible to give an answer,” Bowers said.

This leaves the police who worked at Building 606 in a frustrating sort of limbo: No one can say they were definitely exposed to harm, no one can say they weren’t, and it’s too late to prevent any exposure. All that veterans of the building can do now, says the police union’s Montoya, is research city policies on medical claims, in case more cops get sick in the future.

“There needs to be accountability on some level,” Montoya said. “I don’t know anybody who’s looking to make money on this. People just want to know, and make sure that if somebody comes up with an illness, that they are being taken care of.”

*Jason Fagone and Cynthia Dizikes are San Francisco Chronicle staff writers. Email: [jason.fagone@sfchronicle.com](mailto:jason.fagone@sfchronicle.com), [cdizikes@sfchronicle.com](mailto:cdizikes@sfchronicle.com) Twitter: [@jfagone](https://twitter.com/jfagone), [@cdizikes](https://twitter.com/cdizikes)*

## Cretan, Jeff (MYR)

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**From:** Calvino, Maria Soledad <Calvino.Maria@epa.gov>  
**Sent:** Tuesday, November 06, 2018 10:43 AM  
**To:** Franklin, William D CIV NAVFAC HQ, BRAC PMO; Kagan, Rachael (DPH); Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); McKinney, Kasheica (CII); juanita.bacey@dtsc.ca.gov  
**Cc:** LEE, LILY  
**Subject:** EPA response to the SF Chronicle  
**Attachments:** 2018-11-1 EPA Response Building 606 SF Chronicle Inquiry\_FINAL.DOCX

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning PIO Team,  
FYSA – Attached is a series of responses that EPA sent to the SF Chronicle regarding B606.

Thank you,  
Soledad

**Soledad Calvino**  
Press Officer | Office of Public Affairs  
U.S. Environmental Protection Agency | Region 9  
[calvino.maria@epa.gov](mailto:calvino.maria@epa.gov)  
Office 415.972.3512 | Mobile 415.697.6289

**Hunters Point Naval Shipyard Parcel  
EPA response to Building 606 SF Chronicle Inquiry 11-2-2018 (Final)**

Hi Cynthia and Jason,

Hope the responses below help clarify the questions raised – we moved quickly to meet your deadline. We do want to express the importance of using site-specific parameters in the PRG Calculator, as opposed to default parameters that do not reflect likely exposures and can provide misleading results.

**Q1. Why did the EPA allow the Navy to use the DAC standard instead of the PRGs? The air monitoring that was being used couldn't see anything below 10% of DAC, which is far above the PRG limits for the public. Given that, how can the EPA know that the air concentrations weren't a problem for the public? Is there air data that the EPA reviewed at the time, and calculations that the EPA ran that form the basis for the current assurances the EPA is making about the airborne radioactivity around RSY2? If so, can you provide those?**

**A1.** The Nuclear Regulatory Commission (NRC) uses the Derived Air Concentration (DAC) as a limit for nuclear facilities in which workers have specialized training and multiple forms of protection to work in an environment with potential radiological hazards. These include, for example, wearing dosimeters (monitors that track radiation dose received by an individual over time).

At the Hunters Point Naval Shipyard, workers doing testing and cleanup for potentially radiologically impacted areas also have specialized training and multiple forms of protection to work in an environment with potentially radiological hazards. 10% of the DAC is 10 times more protective than the NRC standard for those radiological workers. The Navy has stated that no radiological workers have reported monitoring results from dosimeters that have ever exceeded any health-based limits. As we explained in our earlier response, at the Hunters Point Naval Shipyard, using 10% of the DAC as a screening level would be consistent with protective screening levels in an EPA Superfund context for the most common alpha and beta sources. At Superfund sites, EPA also often uses its Preliminary Remediation Goal (PRG) Calculator as another form of screening evaluation. This is primarily done to select cleanup goals so that future workers and residents will not be exposed to long-term risks that exceed the National Contingency Plan regulation levels of  $10^{-6}$  to  $10^{-4}$  excess cancer risk after cleanup is complete. EPA does not have guidance specifying whether to use the EPA PRG Calculator or the NRC standards for protection of workers doing short-term cleanup activities. Superfund sites nationwide have used either approach.

**Q2. Also, you mention, "EPA has used site-specific parameters in the PRG Calculator..." We are confused about the timeline here. When did EPA do this calculation? Was this done at the time to verify the safety of using DAC at this site? Was this done after we inquired about it?**



**A2.** For the protection of workers doing short-term cleanup activities, EPA does not have guidance that specifies whether to use the EPA PRG Calculator or the NRC standards. Superfund sites nationwide have used either approach. However, after you inquired about it, we did an additional check using the PRG Calculator to see how the results compared (see A-3 below).

**Q3.** And to Jason's point below, what are the site-specific parameters you used and why? And what are the risks you got for specific contaminants? In other words, can you provide us with the actual PRG runs you did with inputs that depart from default, along with detailed explanations of why those decisions were deemed appropriate for this location/the nearby police?

**A3.** To be more conservative (i.e., protective) than the 'Indoor Worker' scenario and the scenario with radiologically trained and protected worker, EPA ran an "Outdoor Worker" Air scenario. According to the User's Guide, "This is a long-term receptor exposed during the work day who is a full-time employee working on-site and who spends most of the workday conducting maintenance activities outdoors." For Building 606 police staff who are mostly working indoors, the risk would be less than for an outdoor worker, who might be directly exposed to dust at the location she or he is working.

**Outdoor worker scenario:** The 2010 *Dust Control Plan* shows 10% of the DAC as the standards for three Radionuclides of Concern (ROCs) Ra-226, Cs-137, Sr-90. These were the most widely used radionuclides at the Hunters Point Naval Shipyard site and been the most commonly found radionuclides during testing and cleanup. Ra-226 comprises over 90% of the ROCs. We ran the EPA PRG Calculator risk estimate for an 'Outdoor Worker' air scenario and assumed the following:

- 4 years – the expected time frame for completing field work for a specific section of the site, under a single contract, with specific associated workers.
- 40 days per year – 6 weeks was often needed to process a single load of soil on an RSY pad. For that single load, scanning and sampling typically took 4 hours. Then before that load could be moved, the process required 3 weeks for radionuclides in soil samples to come into equilibrium. After that, the lab needed to do analysis, which would be sent for Navy technical review and approval. That process usually took a minimum of 6 weeks, but some times more. During a typical year, a single RSY pad might go through this process 8 times. This would mean 4 hours X 8 loads = 32 hours per year. Close to Building 606, possibly up to 10 RSY pads might have been processing soil simultaneously. 32 hours per year per pad X 10 pads = 320 hours per year. At 8 hours per day, the total days per year would be 320 hours divided by 8 hours = 40 days per year.
- 0.12 hours per day – Dust is generated when the wind blows over 15 miles/hr. Wind data collected over 70 years nearby shows that the wind blows above 13 miles/hour approximately 30% of the time. 8 hours X 30% = 2.4 hours per day. Dust control plans require a standard of "no visible dust" and various measures, such as the requirement to

stop work at windspeeds above 25 mph winds and wetting of soil. Dust control measures have been demonstrated to significantly reduce dust. In addition, the wind blows primarily across RSY 2 in the opposite direction from Building 606. Due to these considerations, we estimate actual exposure to dust to occur 5% of the work day when the wind speed exceeds 15 miles per hour.  $2.4 \text{ hours per day} \times 5\% = .12 \text{ hours/day exposure}$ .

These site-specific parameters lead to a risk estimate of  $3.2 \times 10^{-5}$  for Cs-137,  $8.5 \times 10^{-5}$  for Ra-226, and  $4.2 \times 10^{-6}$  for Sr-90. These are within the National Contingency Plan (NCP) risk range of  $10^{-6}$  to  $10^{-4}$  used at Superfund sites.

On October 23, you provided a snapshot of air data with alpha and beta results, which appear to show 8-hour accumulation. The difference between the monitoring results upwind (baseline) and the downwind represents contamination that could have blown from the worksite. We took the highest difference between the downwind and upwind monitoring results and used the EPA PRG Calculator to estimate a risk of  $2 \times 10^{-7}$  for alpha and beta combined. We assumed 100% alpha activity came from Ra-226 (which is a more protective assumption). For beta activity, we assumed that half came from Sr-90 and half from Cs-137. Again, this calculated risk is within the NCP risk range.

## PREVIOUS EXCHANGES WITH REPORTER

**October 30, 2018**

**SF Chronicle, Jason Fagone/Cynthia Dizikes**

Follow up to previous response:

Hi there, can you please explain what you mean by exposure parameters? What assumptions are you making? And what do you mean by protective? The measurements taken were tens of thousands of times above PRGs for certain isotopes (air/outdoor worker). How is that still protective? Wouldn't the cancer risk be significantly higher?

**Response:**

EPA has used site-specific parameters in the PRG Calculator, as opposed to default parameters that do not reflect likely exposures, and compared output to the risk range of  $10^{-6}$  to  $10^{-4}$  excess cancer risk. At RSY 2, these parameters are influenced by mitigation measures, field schedules, climate, and other conditions.

In addition, EPA has asked the Navy to evaluate radiological standards overall to ensure protectiveness under current site conditions, scientific understanding, and policy requirements.

**October 25, 2018**

**SF Chronicle, Jason Fagone/Cynthia Dizikes**

Follow up to previous response:

Just to be clear, when you say “protective screening levels in an EPA Superfund context” do you mean levels the EPA deems protective for Superfund workers who, like nuclear power industry workers, are knowingly working around radiological materials? Or does the EPA also consider these levels protective for members of the public?

If the latter, aren't these levels far above EPA's PRGs for air for the public?

**Response:**

Given the specific exposure parameters at RSY 2, the levels would protect an outdoor worker located at the cleanup site.

**October 24, 2018**

**SF Chronicle, Jason Fagone/Cynthia Dizikes**

We need to confirm one more thing with you. The snapshot of air sampling data that we did receive from RSY2 was presented as <10% DAC for Alpha and Beta. Just wanted to confirm with you that Derived Air Concentration is a safety limit used for workers in the nuclear power industry and would have been appropriately applied to workers at RSY2, who were also knowingly working with radiological materials.

**Response:**

Yes, the Derived Air Concentration (DAC) is a safety limit used for workers in the nuclear power industry. At the Hunters Point Naval Shipyard, using 10% of the DAC as a screening level would be consistent with protective screening levels in an EPA Superfund context for the most common alpha and beta sources.

**October 4, 2018**

**SF Chronicle, Jason Fagone/Cynthia Dizikes**

We are continuing our reporting of Building 606 at the shipyard. This is the story we did earlier this year:

<https://www.sfchronicle.com/news/article/Amid-a-toxic-landscape-SF-found-a-home-for-its-13101114.php>

We now understand that in 2007, Tetra Tech and the Navy began to surround Building 606 with Radiological Screening Yards and the soil pads associated with those yards. See attached image (from a Navy and Tetra Tech project document). Tetra Tech was also doing radiological remediation work in close proximity to 606. In May 2007, a city industrial hygienist wrote in an email, “Building 606 will also be adjacent to some of the actual storm sewer remediation activities since the storm drains designated for removal are located on the street in front of the buildings main entrance. At some point, building 606 will be surrounded by the remediation activity on three sides of the building.”

City employees working at 606 at the time expressed concerns about the potential health and safety implications for people at the building. And the city industrial hygienist asked explicitly in her email, “Should the Police continue to operate Building 606 during the activity? Do we believe that there is a

potential for Police to be exposed to the radiological or other chemical contamination in the excavated soils?"

The police did continue to operate at Building 606, and there are still about 40 city employees working there today. Our questions to the EPA:

-- Why did the EPA continue to allow the lease of Building 606 in 2007 when the city hygienist was raising these questions?

-- Why did the EPA consider it acceptable that "building 606 will be surrounded by the remediation activity on three sides of the building" while people were still working there every day?

-- The city decided to keep its employees at Building 606 after getting a promise from Tetra Tech that the company would provide radiation air sample data from the RSY pads to the city. Records show that Tetra Tech did provide some snapshots of radiation air sample data to the city, but did not provide the data on a regular basis. The city asked for weekly updates and did not receive them. The Navy also declined to provide regular or weekly radiation air sample data to the city. Was any radiation air sample data from the RSY pads surrounding Building 606 ever provided to the EPA? Did EPA ask for it or review it?

-- City emails show that city officials had a difficult time obtaining radiation air sample data from Tetra Tech. Was the EPA aware of this at the time? Did the EPA get involved in any way?

-- Does the EPA have air monitoring records from the RSYs starting in 2007 showing that there was no danger to the people at 606? RSY2 was next to Building 606 on the east, RSY3 was to the south, and RSY4 to the northwest.

-- Did the EPA send a representative to the 11/28/2007 meeting at Building 606 where SFDPH gave a "Safety and Health Presentation" to the building occupants? If so, who attended? Did the EPA present, if so, can you provide that presentation?

-- Given the scope of the data-faking allegations against Tetra Tech — allegations that have been confirmed in multiple investigations, as the EPA has noted — does EPA have confidence in the accuracy of Tetra Tech's radiation air sample data taken at the RSY pads near Building 606? Or is this data now in question?

-- If the radiation air sample data is in question, does the EPA have concerns that people working at Building 606 were put at risk because of their proximity to these pads and this radiological remediation work?

Given our deadline, we need answers to these question by the end of the day on Friday. Let us know if you have any questions and thank you for your time.

**Response:**

The Navy is the lead on the cleanup at this site and is therefore responsible for maintaining the full Administrative Record, including air monitoring records. Please contact the Navy for data from the time period you are requesting.



During 2007 and subsequently, in any cleanup work done in areas that are potentially radiologically impacted, the Navy contractors protected workers and the public from potential exposure to contamination through a variety of practices. For example, they installed air monitors upwind and downwind of the work area. Water was used to minimize dust production at excavation sites and on streets. Radiological workers wore dosimeters, which are badges that measure how much exposure they have to radiation. Certified radiological experts scanned the tires of trucks and the hands and feet of people leaving a work area. All these practices would have protected workers at Building 606 from radiological contamination from any cleanup work that occurred nearby.

In more recent years, the State Department of Toxic Substances Control industrial hygienists and the Bay Area Air Quality Management District staff have conducted inspections for dust. The Navy's third-party independent contractor oversees radiological work onsite. The Navy routinely sends regulators air monitoring reports from Parcel E-2 work. These reports are available on DTSC's EnviroStor website.

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Monday, November 05, 2018 4:23 PM  
**To:** Cretan, Jeff (MYR)  
**Subject:** SFDPH response to Chronicle  
**Attachments:** FINAL Statement on RSY2.docx; SFDPH response to Chronicle re 2014 emails 11 5 18.docx

Hi Jeff,

Jason and Cynthia are working on another story about the Shipyard. They have been asking questions for several weeks. I have attached the two responses we have submitted to them. One, on October 3, while I was on vacation (I believe Brent shared this with you then.) And, the second one, today.

I'm not sure what the focus of the story is, it seems to be shifting. They tell me it will run this week.

Please let me know if you have any questions or concerns.

Thanks,  
Rachael

Rachael Kagan  
Director of Communications  
San Francisco Department of Public Health  
101 Grove Street  
San Francisco, CA 94102  
415 554-2507  
415 420-5017 cell

3 October 2018; 3:25pm

We understand from your questions that you are interested in a period of time in 2007, when the Navy and Tetra Tech established a Radiologic Soil Screening Yard (RSY2) at the Hunters Point Shipyard, including how the SFDPH evaluated and responded to whether these activities presented a risk to the employees who worked at Building 606.

The SFDPH industrial hygienists then, as now, are focused on the health and safety of employees working at Building 606. At that time, 11 years ago, there was no knowledge of any falsification of soil samples conducted by Tetra Tech.

At all times, screening yards mentioned in your email were owned by the United States government. The Navy is the lead agency responsible for the investigation and cleanup of HPS and holds the Administrative Record for the site. EPA and its state regulatory agency partners oversee and enforce Navy compliance with Superfund requirements to ensure the cleanup at HPS protects human health and environment. At no time has SFDPH had any regulatory authority over the cleanup process itself. SFDPH sought and reviewed information prior to, in 2007, and since then, that has permitted it to reasonably determine that Building 606 employees are safe. SFDPH continues to work with employees at the site and SFPD to assess the area to protect worker safety. SFPD has made its own determinations about continuing to use the site.

Here is a narrative that explains the period you asked about:

In April 2007, SFDPH Director of Occupational Safety and Health, Vickie Wells, assigned an industrial hygienist, Karen Heckman, to look into the Navy's plan to create a radiologic screening yard (RSY2). At the time,

support for Hunters Point Shipyard and the Police Department was primarily handled by another SFDPH industrial hygienist, Peter Wilsey. Heckman's assignment was specific to the new yard, RSY2.

On April 4, 2007, Heckman and SFDPH Safety Officer Tamara Davidson met with Bill Dougherty, Tetra Tech's site manager, to find out more about the planned work activities for the RSY2. He reported to them that the work plan involved bringing potentially contaminated soil into the RSY2, mostly from trenches associated with sewer pipe removal, and then laying the soil in six-inch thick layers onto 1,000 square meter pads, eventually totaling 36 pads<sup>1</sup>. Each pad was surrounded by an 18" deep border/berm. Direct radiological measurements would be taken of each pad. The Navy and Tetra Tech had developed an air monitoring plan that would take daily upwind and downwind air samples, and a windsock would be placed on the site to determine prevailing wind conditions. The entire RSY2 was going to be enclosed by a chain link fence, and the work was estimated to take four years.

Through a Public Records Act request, you have obtained an email that Heckman sent to Vickie Wells on May 24, 2007. Heckman raised many questions that pertained to the health and safety of the Building 606 occupants, which was her job and responsibility. Recalling this period 11 years later, Heckman characterized it as a brainstorming email containing many "what if?" questions that she wanted to discuss with her boss and other DPH occupational safety and health (OSH) staff about the RSY2 work plan and how it might impact Building 606 occupants. That diligence is part of her role as an SFDPH industrial hygienist.

In her advocacy for the Building 606 employees, Heckman was concerned about how they would perceive their risk when the RSY2

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<sup>1</sup> Note: Heckman wrote an email to Vickie Wells on May 24, 2007 that misstated that there would be 100 pads.



work started, and she wanted to understand the procedures the Navy had in place to protect not just their own contract workers but also how those procedures would be protective of City employees at Building 606.

During the meeting between SFDPH staff and Tetra Tech, Heckman recalls discussing the location of the RSY2, which was across Hussey Street, and its proximity to Building 606. The closest pads to the building would be approximately 80 to 100 feet away, with most pads much further away. Note that RSY2 was the only soil screening yard in place at this time. Two others (RSY3 and RSY4) were later established, and both were further away from Building 606.

In addition, the Navy had previously assessed the health risks at the site for the workers on the RSY2 and established protocols for personal protective equipment (PPE). The SFDPH staff learned those workers would be outfitted with Level D PPE consisting of a hard hat, leather gloves, steel toed shoes, safety glasses, and a safety vest for visibility. Level D is used in low hazard work areas. The Navy also had established comprehensive dust mitigation controls in place for work at HPS and the RSY2.

It was important for SFDPH to understand how the workers at RSY2 would be protected and what measures would be taken to mitigate dust in order to assess potential risk to Building 606 employees. The SFDPH staff then sought further information, asking for the air monitoring data for the site collected by Tetra Tech. If that data was not of concern, SFDPH felt it would be better able to reassure Building 606 employees that the safety measures and protocols put in place by the Navy were effective.

It is true that SFDPH encountered obstacles obtaining the data, and we asked Tetra Tech and the Navy for it several times. In September 2007,

SFDPH received sampling data from Tetra Tech for mid-July 2007 through the end of August 2007. The air sampling data for RSY2 demonstrated either non-detectable or very low levels for all of the contaminants monitored (Asbestos, Manganese, Lead, TSP, PM10 and Radioactivity). The radiologic dosimetry data provided was only for the prior quarter (April to July 2007) and showed non-detected for all samples. That was all of the data that was provided to SFDPH<sup>2</sup>. Even without additional data, SFDPH considered the distance from Building 606 to the RSY2, as well as the Navy's extensive safety protocols and procedures for the site, in making its assessment.

Heckman helped to coordinate a November 28, 2007, meeting for Building 606 employees, SFDPH, the Redevelopment Agency and the Navy to share information, address any health and safety concerns that employees had about the Shipyard cleanup, and answer questions. Heckman recalls the meeting was well attended by SFPD staff<sup>3</sup>.

Also in November, Mike Harris was assigned as the SFDPH industrial hygienist at Building 606, and Heckman ceased to work on the Shipyard after the November 28 meeting.

SFDPH has continued to provide support to the Building 606 staff and works together with SFPD to ensure that any health and safety concerns are responded to and addressed. Most recently, we have been conducting another round of tests of the water and air quality of

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<sup>2</sup> You may want to ask the Navy for any additional data.

<sup>3</sup> In answer to one of your questions about the wording of an email from Heckman on October 18 2007, it is not correct to state or suggest that SFDPH Environmental Engineer Amy Brownell served as a "surrogate" for Lennar or any other organization. Heckman's email used informal language and was part of a discussion of the November meeting agenda. Amy Brownell was the most qualified person to present the technical information about air monitoring data on Parcel A to the Building 606 employees. As we have explained before, once the property transfers, SFDPH implements Article 31 of the San Francisco Health Code to ensure that the redevelopment is done in a safe manner, consistent with all federal and state regulatory requirements.

the building, at the employees' request. The results received so far are normal, and we are glad to provide this information to reassure staff.

#####

11/5/18

Jason and Cynthia,

*Here is a response from the Health Department, as you requested by today. I noticed that these questions relate to activities in 2014, whereas your previous questions referenced 2007 activities. I don't see a connection between the two, and just wondered what the story is about.*

*Before addressing the specifics of your questions, we wanted to mention something.*

*The Health Department is troubled by the implications in your questions that Amy Brownell may not have been totally committed to the health and safety of San Francisco residents in her role as SFDPH Environmental Engineer assigned to the Hunters Point Shipyard cleanup and restoration. Nothing could be further from the truth. Ms. Brownell has applied her expertise and dedication to the project for some 25 years, and has contributed to the City's understanding of the technical and scientific aspects of the work. As you know, SFDPH does not have responsibility for the cleanup, which is the Navy's responsibility, overseen by EPA, DTSC and the water boards. SFDPH does play an important role, along with the California Department of Public Health, in standing with the community, providing additional review and independent expertise, and advocating throughout the project for the best possible approaches to ensure community health and safety. That is the essence of public health and we are 100 percent focused on that goal.*

*The Tetra Tech fraud is now known to be a crime, and a particular injury to the community, in addition to a major setback for the Shipyard cleanup and restoration. SFDPH supports every effort to ensure the health and safety of current and future residents, including the rescanning of Parcel A by the California Department of Public Health and the Navy's retesting of Parcel G.*

*We have read the emails that you reference. It appears that excerpts were chosen selectively and out of context. In the responses below, we seek to clarify.*

**Questions about these emails:**

**-- When Brownell wrote, "Navy is trying to keep this as low key as possible," what did she mean by "low key?" Who at the Navy was trying to keep the findings "low key," and why? Also, why would the city health department care if the Navy was trying to keep findings about the shipyard "low key"? Isn't the health department supposed to be doing its own independent analyses?**

*The April 21, 2014 email was from Amy Brownell to a group of consultants to whom she was giving direction about an upcoming conference call with the Navy about a very important matter. It was to be the first conversation about the Tetra Tech wrongdoing.*



*She was instructing them that the Navy wanted to keep the call low key, in order to get through a very large and important agenda, with many participants. So, Ms. Brownell advised them not to speak during it, but only to listen.*

**-- Why did Brownell accept the Tetra Tech and Navy explanation that the false soil samples were not a problem? According to the recent radiological data reviews by the Navy and EPA, the false soil samples referenced in the 2014 report were just the tip of the iceberg, and now those agencies consider all of Tetra Tech's rad data to be unreliable. Does Brownell still stand by her conclusion in 2014 that the false soil samples have "no implications for future" and the investigation of faulty data was a waste of taxpayer money? Or did she make an error in judgment?**

*In 2014, we did not know everything we know now. At that time, the Navy had discovered wrongdoing by Tetra Tech, and the problem was being taken very seriously. There is no assertion in the emails that the false soil samples "were not a problem." It seemed then, based on the information we had, as though the issues were identified and being corrected. As the Navy representative wrote in an April 28 email on the same thread that you are referencing: "Although TtEC has concluded their investigation, the Navy will continue to scrutinize all of TtEC's data to ensure that all anomalous data is identified for all current and future work and take any other appropriate actions."*

*Other than a brief phone call explaining and inviting SFDPH to the April 23, 2014 meeting, that meeting and presentation were the first time SFDPH heard about the Tetrattech investigations into 19 areas where the Navy internal Quality Control review found problems with the Tetrattech data. The Navy's explanation at the meeting, as described in the powerpoint attached to the May 1, 2014 email that you reference, described extensive steps Tetrattech, with Navy oversight, took to address and redo the problems identified including:*

- Disciplinary actions against employees*
- Re-sampling suspect areas*
- Independent Quality Control health physicist oversight*
- Ethics training*

*While we all found the news of the problems disturbing in 2014, at the time, the Navy appeared to take all the appropriate steps to correct the discovered problems.*

**-- Why is a city public health official circulating emails that criticize an effort to scrutinize the cleanup? Isn't it SFDPH's job to scrutinize the cleanup?**

*That is a misrepresentation. Emails are often informal, conversational communications, where language can be imprecise, shorthand or quickly dashed off. Tone is very hard to determine over email.*

*A reminder about roles.*

*The Navy is the lead agency responsible for the investigation and cleanup of HPS and holds the Administrative Record for the site. EPA and its state regulatory agency partners oversee and enforce Navy compliance with Superfund requirements to ensure the cleanup at HPS protects human health and environment. At no time has SFDPH had any regulatory authority over the cleanup process itself.*

*An SFDPH Environmental Engineer (Amy Brownell) has been assigned to this project since 1993, during the Navy restoration and the redevelopment by Lennar/Fivepoint on transferred land. SFDPH reviews information from the Navy and the regulatory agencies and helps to verify that the restoration and transfer will continue to protect public health. In addition, once the property transfers, SFDPH implements Article 31 of the San Francisco Health Code to ensure that the redevelopment is done in a safe manner, consistent with all federal and state regulatory requirements.*

**-- Did Brownell follow through and meet with the pregnant woman working at Building 606?**

*Ms. Brownell is very diligent, thorough and reliable and therefore we expect that she did meet with the employee. However, she has no record of that meeting in 2014, so we cannot verify that it took place.*

**-- If so, what did Brownell tell the woman about health risks associated with radiological work near the building? Did Brownell say that "there are no public health risks" involved with working at Building 606? If so, why was the woman told there were no risks, given the fact that the health department was not monitoring the air near the building for radioactive contamination and had no way to know if the air quality was safe?**

*Even though we cannot speak to that specific meeting, we have provided multiple examples to you previously about the attention to health and safety at B606, the Health Department's responsiveness to employee concerns, and the consistent findings that there are no health risks to employees there.*

*SFDPH has continued to provide support to the Building 606 staff and works together with SFPD to ensure that any health and safety concerns are responded to and addressed.*

## Cretan, Jeff (MYR)

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**From:** Ault, Melanie A CIV NAVFAC HQ, BRAC PMO <melanie.ault@navy.mil>  
**Sent:** Thursday, November 01, 2018 4:22 PM  
**To:** Kagan, Rachael (DPH); Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR);  
Huitric.Michele@epa.gov; Juanita.Bacey@dtsc.ca.gov; McKinney, Kasheica (CII)  
**Cc:** Franklin, William D CIV NAVFAC HQ, BRAC PMO  
**Subject:** Update to Hunters Point website

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

All,

On behalf of Bill Franklin, BRAC Program Management Office Public Affairs Officer, the Navy has updated the former Naval Shipyard Hunters Point Timely Topics webpage.

Here is the url.

[https://www.bracpmo.navy.mil/brac\\_bases/california/former\\_shipyard\\_hunters\\_point/timely\\_topics.html](https://www.bracpmo.navy.mil/brac_bases/california/former_shipyard_hunters_point/timely_topics.html)

Melanie Ault  
BRAC Program Coordinator  
(619) 524-4520  
[www.bracpmo.navy.mil](http://www.bracpmo.navy.mil)

## Cretan, Jeff (MYR)

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**From:** Calvino, Maria Soledad <Calvino.Maria@epa.gov>  
**Sent:** Monday, October 22, 2018 10:54 AM  
**To:** Franklin, William D CIV NAVFAC HQ, BRAC PMO; Kagan, Rachael (DPH); Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); McKinney, Kasheica (CII); juanita.bacey@dtsc.ca.gov  
**Cc:** LEE, LILY  
**Subject:** EPA response to Curbed SF inquiry

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Good morning PIO Team,

FYSA – Below are the responses that EPA sent to Chris Roberts, Curbed SF reporter, late last week.

October 18, 2018

**Q1:** I apologize in advance for the short notice and tight deadline, but researchers formerly with UC Santa Cruz today released a pair of reports criticizing the Navy's assessment and cleanup of the radioactivity at the former Navy shipyard at Hunters Point, which is an EPA superfund site.

They can be found here: <http://committeetobridgethegap.org>.

The main takeaways are that the Navy spread far more contamination over Hunters Point than previously publicly acknowledged and that the Navy did not scan enough of the shipyard for the appropriate radionuclides of concern. We need to see if we can include comment from the EPA on these reports. Do we think that areas including Parcel A that have been declared clean need to be rescanned? Should the entire base be redone? Can it still be cleaned up to safe standards?

(I know the EPA has recently criticized the Navy's proposed remediation of Parcel G as well; if there are any letters or memos exchanged between the EPA and Navy over the past month on the shipyard, can you also provide a copy?) Unfortunately my deadline on this is almost immediate. But if the EPA can provide us with information, we can always add to our story after it is published online.

**A1:** Given your tight deadline, this is all I have available right now:

- **Parcel A:** Since July, the California Department of Public Health (CDPH) has been doing a radiological scan of Parcel A, where residents already live. Over 95% of Parcel A has been rescanned by CDPH. Please visit CDPH's website for the latest [progress update](#) and additional information:  
<https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/RHB-Environment/Hunters-Point-Naval-Shipyard-Parcel-A-1-Survey.aspx>
- **Parcel G:** The Navy has agreed to complete a health and safety scan of all accessible areas of Parcels G, D-2, UC-1, and UC-2. Please visit the Navy's website for their full October 3<sup>rd</sup> statement:  
[https://www.bracpmo.navy.mil/brac\\_bases/california/former\\_shipyard\\_hunters\\_point/timely\\_topics.html](https://www.bracpmo.navy.mil/brac_bases/california/former_shipyard_hunters_point/timely_topics.html)
- **EPA correspondence with the Navy:** You can find all site documents on our [website](#). Here's a link to EPA's review of the Draft Parcel G Removal Site Evaluation, Sampling and Analysis Plan (SAP), from September 24, 2018:  
<https://semspub.epa.gov/work/09/100010673.pdf>

October 19, 2018

**Q2:** Thanks, this is helpful! I think we are going live this morning. It does indeed appear that the EPA has criticized the Navy recently, but maybe if we can work on this: Does EPA believe that the entirety of the base needs to be scanned for all of the radionuclides mentioned in the report, or does EPA still accept the Navy's contention that most of the base was not contaminated with low-level radioactive waste?



**A2:** EPA's focus right now is on working with the Navy and other regulatory agencies to create a sampling approach and plan for Parcel G, which includes a scan of all accessible areas of Parcel G. As we move forward, EPA, along with the other regulatory agencies, will assess proposed retesting at other parcels.

**Soledad Calvino**

Press Officer | Office of Public Affairs

U.S. Environmental Protection Agency | Region 9

[calvino.maria@epa.gov](mailto:calvino.maria@epa.gov)

Office 415.972.3512 | Mobile 415.697.6289

## Cretan, Jeff (MYR)

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**From:** Calvino, Maria Soledad <Calvino.Maria@epa.gov>  
**Sent:** Friday, October 05, 2018 12:34 PM  
**To:** Franklin, William D CIV NAVFAC HQ, BRAC PMO; Kagan, Rachael (DPH); Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); juanita.bacey@dtsc.ca.gov; McKinney, Kasheica (CII)  
**Cc:** LEE, LILY  
**Subject:** EPA response to The Verge inquiry

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Good afternoon PIO Team,  
FYSA – Below is the response that EPA sent to The Verge on Oct. 3.

**Q1. I understand that the EPA told the Navy in 2017 that 90 percent of the work TetraTech did in Parcel B was suspect, and 97 percent in Parcel G was not reliable, as well. Is my interpretation of those numbers, from this letter correct?**

[https://www.peer.org/assets/docs/epa/4\\_9\\_18\\_EPA\\_comment\\_summary.pdf?eType=EmailBlastContent&eld=71b47782-14d8-4693-82ec-e9c827dd7ce4](https://www.peer.org/assets/docs/epa/4_9_18_EPA_comment_summary.pdf?eType=EmailBlastContent&eld=71b47782-14d8-4693-82ec-e9c827dd7ce4)

**Response:** EPA, DTSC, and CDPH found signs of potential falsification, data manipulation, and/or data quality concerns that call into question the reliability of soil data in 90% of the total suspect soil survey units in parcel B and 97% of suspect survey units in Parcel G. Please see this link to EPA's findings from our independent review of Parcels B and G soil testing data: <https://semspub.epa.gov/work/09/100006302.pdf>

**Q2. Is that the latest assessment? Have those numbers been updated? For example, have other parcels been assessed by the EPA?**

**Response:** Here is a link to EPA's evaluation of soil testing data from Tetra Tech EC Inc. in Parcels D-2, UC-1, UC-2, and UC-3: <https://semspub.epa.gov/work/09/100006302.pdf>

**Q3. CDPH says that EPA conducted "conducted a radiological survey of Parcel A in 2002."**

(<https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/RHB/Environment/Final%20Hunters%20Point%20-%20Parcel%20A1%20-%20Summary.pdf>). Can you tell me more about that survey? How was it conducted, and what were the results? Why, then, are folks asking for Parcel A to be checked again — and how did the scan miss material like that radium-painted dock marker reportedly found at parcel A?  
(<https://www.sfchronicle.com/bayarea/article/Radioactive-object-found-near-homes-at-Hunters-13228476.php>)

**Response:** In 2002, EPA conducted a radiological scanner van survey of Parcel A and navigable roads on other parts of the shipyard. All of the anomalies detected during the scan were attributable to natural occurring sources at levels consistent with what would normally be found in the environment. The radiological scanner van survey gave information related to certain types of potential radiological exposures closer to the surface; it did not address all types of radiation potentially present or deeper locations of contamination. The scanner van survey is also subject to other limitations listed in the

attached report, e.g. only limited locations were accessible, asphalt would have shielded some gamma radiation, etc.

The deck marker was found at the bottom of a hillside, in an unpaved area not accessible to a vehicle, near the boundary of Parcel A. This area had not been previously scanned by EPA. In addition, after the Navy transferred Parcel A to the City/County of San Francisco, considerable earthmoving changed the surface of the property. The areas that EPA originally scanned are no longer the surfaces where current residents live.

**Q4. Why are the EPA's numbers re: unreliable work so much larger than the Navy's? Is the shipyard safe for the community living in Parcel A, or the rest of the Bayview Hunters Point community living next door?**

**Response:** In regards to the discrepancy in the percentages, EPA's assessment of the data included looking more closely for signs of potential data quality problems in addition to signs of potential falsification. For example, EPA recommended resampling when data were missing or when different data collection methods did not produce consistent results.

Based on the work done and history of the site, we do not believe anyone living or working at Hunters Point faces any health risk. For the entire site, over the past decades, EPA and the state have been monitoring radiological conditions on an ongoing basis to ensure the safety of the surrounding community. For example, we have been reviewing radiological data collected by a variety of contractors from air monitors (both upwind and downwind), groundwater samples, and fence line scans. Environmental regulators have also done independent radiological testing in some locations, such as hand scans, collecting swipe samples, and analyzing duplicate soil samples in independent laboratories.

On Parcel A, the State of California Department of Public Health (CDPH) has almost completed new gamma scans in the location where current residents live and has thus far not found harmful levels of radiation that could expose residents. CDPH did find one Navy ship's deck marker. Due to its location and level of radiation, the object was not causing harm to residents or workers.

The concerns we have about Tetra Tech EC Inc. would not impact the health of current residents in Parcel A or the surrounding community. The areas under question are enclosed under protective covers or inside locked buildings in secured parts of the site. We believe that these measures, routine monitoring described above, and other protections, including dust controls, are protecting the community as our investigation and clean-up activities proceed.

**Q5. What are the EPA's concerns about the Navy's plans to retest the site, and is the EPA satisfied the Navy is addressing those concerns?**

**Response:** Here are links to EPA's comments on Navy drafts of Work Plans to retest the site on March 26, 2018, (<https://semspub.epa.gov/work/09/100009179.pdf>) and August 14, 2018, (<https://semspub.epa.gov/work/09/100009276.pdf>). The Navy expects to release a revised Work Plan for Parcel G in October 2018. EPA will review that draft to evaluate the Navy's responses to our comments.

**Follow-up Q. Is the shipyard STILL a superfund site?**

**Response:** The Hunters Point Naval Shipyard comprises over a dozen different parcels. Most of those parcels remain on the Superfund National Priorities List. Parcel A was removed from this list in 1999 and was transferred to the City of San Francisco for development in 2004.

Have a great weekend!

**Soledad Calvino**

Press Officer | Office of Public Affairs

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## Cretan, Jeff (MYR)

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**From:** Calvino, Maria Soledad <Calvino.Maria@epa.gov>  
**Sent:** Thursday, October 04, 2018 2:30 PM  
**To:** Franklin, William D CIV NAVFAC HQ, BRAC PMO; Kagan, Rachael (DPH); Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); juanita.bacey@dtsc.ca.gov; McKinney, Kasheica (CII)  
**Cc:** LEE, LILY  
**Subject:** EPA response to SF Chronicle inquiry  
**Attachments:** SF Chronicle questions to EPA 9-25-18.docx

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Hi PIO Team,  
FYSA – Below is the response that EPA sent to the SF Chronicle earlier today.

### **Hunters Point Naval Shipyard**

#### **EPA response to SF Chronicle inquiry – Building 606, 10/04/2018**

The Navy is the lead on the cleanup at this site and is therefore responsible for maintaining the full Administrative Record, including air monitoring records. Please contact the Navy for data from the time period you are requesting.

During 2007 and subsequently, in any cleanup work done in areas that are potentially radiologically impacted, the Navy contractors protected workers and the public from potential exposure to contamination through a variety of practices. For example, they installed air monitors upwind and downwind of the work area. Water was used to minimize dust production at excavation sites and on streets. Radiological workers wore dosimeters, which are badges that measure how much exposure they have to radiation. Certified radiological experts scanned the tires of trucks and the hands and feet of people leaving a work area. All these practices would have protected workers at Building 606 from radiological contamination from any cleanup work that occurred nearby.

In more recent years, the State Department of Toxic Substances Control industrial hygienists and the Bay Area Air Quality Management District staff have conducted inspections for dust. The Navy's third-party independent contractor oversees radiological work onsite. The Navy routinely sends regulators air monitoring reports from Parcel E-2 work. These reports are available on DTSC's EnviroStor website.

**Soledad Calvino**  
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Hi Soledad,

We are continuing our reporting of Building 606 at the shipyard. This is the story we did earlier this year:

<https://www.sfchronicle.com/news/article/Amid-a-toxic-landscape-SF-found-a-home-for-its-13101114.php>

We now understand that in 2007, Tetra Tech and the Navy began to surround Building 606 with Radiological Screening Yards and the soil pads associated with those yards. See attached image (from a Navy and Tetra Tech project document). Tetra Tech was also doing radiological remediation work in close proximity to 606. In May 2007, a city industrial hygienist wrote in an email, "Building 606 will also be adjacent to some of the actual storm sewer remediation activities since the storm drains designated for removal are located on the street in front of the buildings main entrance. At some point, building 606 will be surrounded by the remediation activity on three sides of the building."

City employees working at 606 at the time expressed concerns about the potential health and safety implications for people at the building. And the city industrial hygienist asked explicitly in her email, "Should the Police continue to operate Building 606 during the activity? Do we believe that there is a potential for Police to be exposed to the radiological or other chemical contamination in the excavated soils?"

The police did continue to operate at Building 606, and there are still about 40 city employees working there today. Our questions to the EPA:

-- Why did the EPA continue to allow the lease of Building 606 in 2007 when the city hygienist was raising these questions?

-- Why did the EPA consider it acceptable that "building 606 will be surrounded by the remediation activity on three sides of the building" while people were still working there every day?

-- The city decided to keep its employees at Building 606 after getting a promise from Tetra Tech that the company would provide radiation air sample data from the RSY pads to the city. Records show that Tetra Tech did provide some snapshots of radiation air sample data to the city, but did not provide the data on a regular basis. The city asked for weekly updates and did not receive them. The Navy also declined to provide regular or weekly radiation air sample data to the city. Was any radiation air sample data from the RSY pads surrounding Building 606 ever provided to the EPA? Did EPA ask for it or review it?

-- City emails show that city officials had a difficult time obtaining radiation air sample data from Tetra Tech. Was the EPA aware of this at the time? Did the EPA get involved in any way?

-- Does the EPA have air monitoring records from the RSYs starting in 2007 showing that there was no danger to the people at 606? RSY2 was next to Building 606 on the east, RSY3 was to

the south, and RSY4 to the northwest.

-- Did the EPA send a representative to the 11/28/2007 meeting at Building 606 where SFDPH gave a "Safety and Health Presentation" to the building occupants? If so, who attended? Did the EPA present, if so, can you provide that presentation?

-- Given the scope of the data-faking allegations against Tetra Tech — allegations that have been confirmed in multiple investigations, as the EPA has noted — does EPA have confidence in the accuracy of Tetra Tech's radiation air sample data taken at the RSY pads near Building 606? Or is this data now in question?

-- If the radiation air sample data is in question, does the EPA have concerns that people working at Building 606 were put at risk because of their proximity to these pads and this radiological remediation work?

Given our deadline, we need answers to these question by the end of the day on Friday. Let us know if you have any questions and thank you for your time.

Cynthia Dizikes and Jason Fagone

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Friday, September 28, 2018 3:46 PM  
**To:** Cretan, Jeff (MYR)  
**Cc:** Barnes, Maximilian (CII); Andrew, Brent (DPH)  
**Subject:** Re: Press inquiry from The Verge: Cleanup and risks at Hunters Point

Brent Andrew will be covering next week while I am on vacation.

Thanks  
Rachael  
Sent from my overrated iPhone

On Sep 28, 2018, at 2:32 PM, Cretan, Jeff (MYR) <[jeff.cretan@sfgov.org](mailto:jeff.cretan@sfgov.org)> wrote:

Shipyard questions.

**From:** Hussey, Deirdre (MYR)  
**Sent:** Friday, September 28, 2018 2:22 PM  
**To:** Cretan, Jeff (MYR) <[jeff.cretan@sfgov.org](mailto:jeff.cretan@sfgov.org)>  
**Subject:** Fwd: Press inquiry from The Verge: Cleanup and risks at Hunters Point

Begin forwarded message:

**From:** Rachel Becker <[rachel.becker@theverge.com](mailto:rachel.becker@theverge.com)>  
**Date:** September 28, 2018 at 12:53:55 PM PDT  
**To:** [Malia.Cohen@sfgov.org](mailto:Malia.Cohen@sfgov.org), [Aliya.Chisti@sfgov.org](mailto:Aliya.Chisti@sfgov.org),  
[Sophia.Kittler@sfgov.org](mailto:Sophia.Kittler@sfgov.org), [Iowayna.Pena@sfgov.org](mailto:Iowayna.Pena@sfgov.org)  
**Cc:** [deirdre.hussey@sfgov.org](mailto:deirdre.hussey@sfgov.org), [mayorspressoffice@sfgov.org](mailto:mayorspressoffice@sfgov.org)  
**Subject:** Re: Press inquiry from The Verge: Cleanup and risks at Hunters Point

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Hello! Just following up. I also wanted to ask how long the Shipyard project will be stalled during the Navy's retesting, and how much this delay is anticipated to cost the developers and the city? Also, is Parcel A safe? What about the rest of the Shipyard? And how was the falsification of results by Tetra Tech workers allowed to happen in the first place?

Thank you, my deadline is first thing on Thursday October 4th.



Rachel

On Tue, Sep 25, 2018 at 11:13 AM Rachel Becker

<[rachel.becker@theverge.com](mailto:rachel.becker@theverge.com)> wrote:

Hello! I'm a science journalist at The Verge, a Vox Media web publication about science, technology, and culture, and I'm working on a video for our Verge Science YouTube channel about the environmental contamination and the cleanup at the Hunters Point Shipyard. I understand that there's a lot of controversy about the risks, mishandled test samples, and re-testing. I'd love to speak with you to understand what happened, the risks and plans to mitigate those risks are going forward, and how this will affect the local community and development in the area. My deadline is next Thursday, October 4th. Would there be a good time for me to give you a phone or Skype call before then?

Thank you,

Rachel Becker

--

Science Journalist, *The Verge*

Tel: 650 485 1493

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The Verge, founded in 2011, covers technology, science and art.

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Science Journalist, *The Verge*

Tel: 650 485 1493

@RA\_Becks

The Verge, founded in 2011, covers technology, science and art.

## Cretan, Jeff (MYR)

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**From:** Franklin, William D CIV NAVFAC HQ, BRAC PMO <william.d.franklin@navy.mil>  
**Sent:** Wednesday, September 26, 2018 1:35 PM  
**To:** Kagan, Rachael (DPH); Bacey, Juanita@DTSC (Juanita.Bacey@dtsc.ca.gov); Cretan, Jeff (MYR); McKinney, Kasheica (CII); 'Calvino, Maria Soledad'  
**Cc:** Dale.Schornack@cdph.ca.gov  
**Subject:** FW: questions from SF Chronicle about Tetra Tech, Navy, and Building 606  
**Attachments:** SF Chronicle questions to Navy 9-25-18.docx; pads.png; 2007-08-06 From Ralph Pearce.pdf

>>>Team, Jason Fagone (Chronicle) sent us the query below yesterday afternoon. We're evaluating how/when to respond. I'll share our response once developed. He's requested a response by COB Friday.

>>>Rachael, the IH that the Chronicle refers to is:

Karen Heckman MPH, CIH Senior Industrial Hygienist Occupational Safety and Health (OSH) Section San Francisco  
Department of Public Health 101 Grove Street, Room 217 San Francisco, CA 94102 Phone (415)554-2762 Fax (415) 554-2562 Email Karen.Heckman@sfdph.org

R, Bill

-----Original Message-----

From: Fagone, Jason <Jason.Fagone@sfchronicle.com>  
Sent: Tuesday, September 25, 2018 2:49 PM  
To: Franklin, William D CIV NAVFAC HQ, BRAC PMO <william.d.franklin@navy.mil>  
Cc: Dizikes, Cynthia <CDizikes@sfchronicle.com>  
Subject: [Non-DoD Source] questions from SF Chronicle about Tetra Tech, Navy, and Building 606

Hi Bill,

We are continuing our reporting of Building 606 at the shipyard.

We now understand that in 2007, Tetra Tech and the Navy began to surround Building 606 with Radiological Screening Yards and the soil pads associated with those yards. See attached image (from a 2010 Tetra Tech / Navy map in a project document). Tetra Tech was also doing radiological remediation work in close proximity to 606. In May 2007, a city industrial hygienist wrote in an email, "Building 606 will also be adjacent to some of the actual storm sewer remediation activities since the storm drains designated for removal are located on the street in front of the buildings main entrance. At some point, building 606 will be surrounded by the remediation activity on three sides of the building."

Tetra Tech's project manager, Bill Dougherty, indicated at one point that he thought the most contaminated areas of the site would be directed to the new pad yard next to 606 - known as RSY2. Other pads were later constructed at RSY3 (to the south of Building 606) and RSY4 (to the northwest).

City employees working at 606 expressed concerns about the potential health and safety implications for people at the building. And the city industrial hygienist asked explicitly in her email, "Should the Police continue to operate Building 606 during the activity? Do we believe that there is a potential for Police to be exposed to the radiological or other chemical contamination in the excavated soils?"

The city's communications from the time indicate that the city had difficulty obtaining timely information from Bill Dougherty/Tetra Tech about radiation monitoring at the soil pads next to Building 606. An industrial hygienist asked the Navy's Ralph Pearce to provide weekly results of radiation air monitoring sampling at the RSY yard next to Building 606 (RSY2). Pearce wrote in an email on 8/6/2007 that the Navy wouldn't provide this information and that instead the city would have to get it directly from Tetra Tech, from the same person who had been delaying in providing the information earlier (Bill Dougherty).

We have no records indicating that the city ever got consistent air monitoring data from either Tetra Tech or the Navy. The police continue to operate at Building 606, and there are still about 40 city employees working there today. Our questions to the Navy:

-- Why did the Navy continue to lease Building 606 in 2007 after it knew that some of the most contaminated soil in the shipyard might be taken to nearby RSY pads?

-- Why did the Navy consider it acceptable that "building 606 will be surrounded by the remediation activity on three sides of the building" while people were still working there every day?

-- In Ralph Pearce's 8/6/2007 email (attached here as a PDF), he responds to a question from city industrial hygienist Karen Heckman. Heckman asks Pearce/Navy for reports on radiation air samples "on a weekly basis." Pearce replies, "It will be simpler and more timely to make available current results for review. Tetrattech EC (TtEC) is the Navy's prime contractor for the sewer excavation work and RSV operation and has field offices at Hunters Point. You, or other representatives of the city, are invited to examine the results at TtEC's field office located at Hunters Point. Please contact Bill Dougherty (TtEC Construction Manager) at (415) 671-1990 to schedule an appointment time and he will make this information available." Why did Pearce and the Navy decline to provide weekly data to the city? Is it standard procedure for the Navy to refer other government agencies directly to its prime contractor to obtain air monitoring and safety data?

-- City emails from 2007 show that after the Navy declined to provide this data and referred the city to Tetra Tech and Bill Dougherty, the city had repeated difficulties actually obtaining this data from Tetra Tech. Was the Navy aware at the time that Tetra Tech was not providing this data in a timely way?

-- Was radiation air sample data gathered consistently at RSY2, RSY3, and RSY4 starting in 2007? If so, can you provide this data to us?

-- Given the scope of the data-faking allegations against Tetra Tech - allegations that have been confirmed in multiple investigations - does the Navy have confidence in the accuracy of Tetra Tech's radiation air sample data taken at the RSY pads near Building 606? Or is this data now in question?

-- If the radiation air sample data is in question, does the Navy have concerns that people working at Building 606 were put at risk because of their proximity to these pads and this radiological remediation work?

Given our deadline, we need answers to these question by the end of the day on Friday.

These same questions are also attached as a Word file, in case there are any formatting issues in this email that make the questions difficult to read.

Let us know if you have any questions and thank you for your time.

Jason Fagone and Cynthia Dizikes  
Chronicle reporters



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Given our deadline, we need answers to these question by the end of the day on Friday. Let us know if you have any questions and thank you for your time.

Jason Fagone and Cynthia Dizikes  
Chronicle reporters

## Heckman, Karen (DPH)

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**From:** Pearce, Ralph E CIV NAVFAC SW <ralph.pearce@navy.mil>  
**Sent:** Monday, August 06, 2007 4:39 PM  
**To:** Karen Heckman  
**Cc:** Vickie Wells; Tamara Davidson; bill.dougherty@tteci.com; Forman, Keith S CIV OASN (I&E) BRAC PMO West; Jensen, Dane C CIV NAVFAC SW; Klimek, Ann CIV OASN (I&E) BRAC PMO West; Larson, Elizabeth A CIV OASN (I&E) BRAC PMO West; McFadden, Patricia A CIV OASN (I&E) BRAC PMO West; amy\_brownell@dph.sf.ca.us  
**Subject:** RE: Additional questions regarding soil screening area and potential concerns for Building 606 Occupants.

Karen,

I wanted to get back to your list of questions you had previously sent. Hope this email finds you well rested and your time off went well. Below is the list of your questions with a response inserted for each. Please give me a call with any further questions or issues.

Ralph  
(619)532-0912 office  
(814)883-3504 cell

As you know, I'm interested in obtaining information regarding work activities, monitoring data and control measures pertaining to field work and soil screening activities at HP as they may impact potential Health concerns of SFPD staff who occupy Building 606. During our phone conversation yesterday, we discussed some areas where I need additional information and you agreed to help me fill in those gaps. Here's a summary of those questions:

Has the soil screening activity already started? You indicated that you thought it was beginning on 7/19/07. What is the actual start date?

Response: Soil screening was initiated with the start excavation activities on 7/19/07.

What air monitoring data will be collected or is already being collected at the soil screening area? You indicated in our phone call that you believed all of the contaminants in the Air Monitoring Plan (AMP) would apply to the soil screening area. Can you confirm this?

Response: Monitoring is being performed as outlined in the AMP. Monitoring stations are positioned upwind and downwind of the radiological screening yard (RSY) to sample for total suspended particulates (including Mn and Pb analyses), PM10, and asbestos. Monitors are also in use upwind and downwind of the RSY to sample for radionuclides of concern. All radiological workers are required to wear dosimeters, which are changed out periodically for analysis. Consistent with the health and safety plan, personal data rams are employed periodically upwind and downwind of the RSY to monitor total respirable dust and metals and, if necessary, equip representative workers with personal air pumps to monitor for total dust (results from this monitoring are available on-site).



You indicated that Asbestos air monitoring was going to be performed at the soil screening area per the Air Monitoring Plan. Can you confirm that this is correct since Amy Brownell had previously mentioned to me that she thought Asbestos might not be included?

Response: Please refer to preceding response, asbestos sampling is included.

The Air Monitoring Plan, in Table 3-1, describes the materials that will be analyzed and their frequency, but the table does not specifically include the soil screening yard. Does that scenario fall under the Excavation and Soil Handling Test Scenario on Table 3-1? If not, what air monitoring plans apply?

Response: Activities in the RSY are categorized as 'soil handling'.

Can you provide the air sampling results, taken at the soil screening area, to me on a weekly basis? If the soil screening area has already started activity, can I be provided with any air sampling that has already taken place?

Response: All monitoring results are maintained on site in the project files. Rather than produce additional copies of results on a regular basis, it will be simpler and more timely to make available current results for review. Tetrattech EC (TtEC) is the Navy's prime contractor for the sewer excavation work and RSY operation and has field offices at Hunters Point. You, or other representatives of the city, are invited to examine the results at TtEC's field office located at Hunters Point. Please contact Bill Dougherty (TtEC Construction Manager) at (415) 671-1990 to schedule an appointment time and he will make this information available.

What PPE is required for workers who are assigned to the soil screening area? Can we be provided with summarized personnel monitoring results for those workers so that we can explain to the SFPD staff what exposure levels are being encountered by soil screening workers?

Response: RSY workers are required to wear Level D PPE, consisting of a hard hat, leather work gloves (as needed), steel-toe boots, safety glasses, and a high-visibility safety vest. Regarding monitoring results, they are available for review at TtEC's Hunters Point site office.

Who is the Site Health and Safety Specialist? In the Health and Safety Plan (HASP May 23, 2006), this person is identified as making decisions regarding worker PPE.

Response: This position is filled by a fulltime, on-site, TtEC health and safety professional (Mr. Neil Tsubota, C.S.P.).

Is the Health and Safety Plan (HASP) from May 23, 2006 the same document referred to in the Project Work Plan as a Site Specific Health and Safety Plan (SHSP)?

Response: Yes

What specific dust control measures are being used at the soil screening pad? Is water spraying continuous? How often will the pad be sprayed? Will the pads be covered at any point if conditions are windy or if prevailing winds change so that wind direction is towards Building 606?

Response: A water truck is used throughout the workday as needed to minimize dust generation from the roadways located within the RSY. Because the soil that is excavated tends to vary from moist to wet, dust generation during transport and placement on the screening pads is limited but carefully

monitored. When the soil is removed from the pads following radiological clearance, a water spray is used to minimize the potential for dust generation. Because excess water interferes with the radiological screening process, water cannot be used on the pads between the time that the soil arrives in the RSY and it is cleared for release from the RSY. The Navy has no plans to cover screening pads, as data to date indicate it is unnecessary and current practices are working successfully. The air monitoring performed to date in association with the pipe removal and RSY operations has produced no results to suggest that additional dust control efforts are warranted.

Can I get a copy of the relevant RWP (Radiation Work Permit)?

Response: Yes, it is available for review in TtEC's Hunters Point field office.

One of the most important concerns recently raised by SFPD staff is the dust accumulation on their vehicles. Can we arrange for wipe sampling to be done at some interval on those vehicles to demonstrate to SFPD staff that the dust does not present a hazard? I realize that there could be concerns that vehicles are bringing in dust from outside of HP, but I'm sure we could minimize potential conflicts with some procedures in place and by restricting the sampled contaminants to just those that would be most likely originating at HP.

Response: The Navy does not believe that additional sampling of this nature is warranted, as the results of the air monitoring discussed above should provide representative information necessary to dispel any concerns that the SFPD staff may have regarding dust accumulation on vehicles. Further, analysis of residual dirt/dust on a vehicle has no associated comparison values.

Is there a procedure at HP for washing of vehicles?

Response: No vehicle wash down procedures exist. Vehicles with excessive dirt, such as a truck with caked on soils, are dry-swept prior to exiting the work area to minimize the distribution of soils on the roadways.

-----Original Message-----

From: Karen Heckman [mailto:Karen.Heckman@sfdph.org]

Sent: Friday, July 20, 2007 12:35

To: Pearce, Ralph E CIV NAVFAC SW

Cc: Vickie Wells; Tamara Davidson

Subject: Additional questions regarding soil screening area and potential concerns for Building 606 Occupants.

Ralph,

Thanks again for your assistance in facilitating the forwarding of the information I requested in my memo from May, 31, 2007. The documents were very helpful in getting me up to speed on the work being conducted at HP.

As you know, I'm interested in obtaining information regarding work activities, monitoring data and control measures pertaining to field work and soil screening activities at HP as they may impact potential health concerns of SFPD staff who occupy Building 606. During our phone conversation yesterday, we discussed some areas where I need additional

information and you agreed to help me fill in those gaps. Here's a summary of those questions:

Has the soil screening activity already started? You indicated that you thought it was beginning on 7/19/07. What is the actual start date?

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You indicated that Asbestos air monitoring was going to be performed at the soil screening area per the Air Monitoring Plan. Can you confirm that this is correct since Amy Brownell had previously mentioned to me that she thought Asbestos might not be included.

The Air Monitoring Plan, in Table 3-1, describes the materials that will be analyzed and their frequency, but the table does not specifically include the soil screening yard. Does that scenario fall under the Excavation and Soil Handling Test Scenario on Table 3-1? If not, what air monitoring plans apply?

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What specific dust control measures are being used at the soil screening pad? Is water spraying continuous? How often will the pad be sprayed? Will the pads be covered at any point if conditions

are windy or if prevailing winds change so that wind direction is towards Building 606?

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to SFPD staff that the dust does not present a hazard? I realize that there could be concerns that vehicles are bringing in dust from

outside of HP, but I'm sure we could minimize potential conflicts with some procedures in place and by restricting the sampled contaminants to just those that would be most likely originating

at

HP.

Is there a procedure at HP for washing of vehicles?

I'm disappointed that I'll be out of town next week and unable to meet with you when you're in the Bay Area. I'll actually be away from the office until August 7th. So, if you need any clarification or additional information from my office while I'm away, please contact either of the following people:

Vickie Wells, OSH Section Director, 415-554-2797 Tamara Davidson, Safety Officer, 415-554-2614

Thanks again, Ralph. I'll look forward to talking with you when I return.

-Karen

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Karen Heckman MPH, CIH  
Senior Industrial Hygienist  
Occupational Safety and Health (OSH) Section San Francisco Department of Public Health  
101 Grove Street, Room 217  
San Francisco, CA 94102  
Phone (415) 554-2762  
Fax (415) 554-2562  
Email Karen.Heckman@sfdph.org

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Wednesday, September 26, 2018 12:50 PM  
**To:** Cretan, Jeff (MYR)  
**Subject:** Fwd: questions from the SF Chronicle about Building 606, city oversight, and Tetra Tech  
**Attachments:** pads.png; ATT00001.htm; SF Chronicle questions to SFDPH 9-25-18.docx; ATT00002.htm

FYI. We are meeting internally today to discuss.

Sent from my overrated iPhone

Begin forwarded message:

**From:** "Fagone, Jason" <[Jason.Fagone@sfchronicle.com](mailto:Jason.Fagone@sfchronicle.com)>  
**Date:** September 25, 2018 at 3:16:09 PM PDT  
**To:** "[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)" <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** "Dizikes, Cynthia" <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** questions from the SF Chronicle about Building 606, city oversight, and Tetra Tech

Hi Rachael,

We're working on a follow-up to our story about Building 606. It focuses on Tetra Tech's communications with city and building employees during 2007, and on Tetra Tech's Radiological Screening Yards (RSY) that were installed close to 606 and that operated for a number of years. These soil pads were places where radiologically contaminated and potentially contaminated soil was brought from all over the shipyard and laid out to be screened for radioactive materials.

Through our PRA request to SFDPH, you provided us with some records and communications about these soil pads -- what they were, where they were located, and the city's difficulties in getting information about them from Tetra Tech. To better understand the decisions that were made at the time, we are requesting interviews with the following officials mentioned in these records: Karen Heckman, Vickie Wells, and Amy Brownell. We also have a number of questions. We need responses to these by Friday of this week.

-- The records provided to us in the most recent request, #18-2880, are clearly about Building 606 and mention 606 numerous times. Why weren't these provided to us in our original PRA request to SFDPH about Building 606? The original request was #18-1769, submitted May 11, 2018, for "All records related to Building 606 of the Hunters Point Naval Shipyard in San Francisco, California.... between January 1, 1994 and the date this request is fulfilled." This original request should have also produced the records about Tetra Tech and Building 606.

-- Are there other records on the way from Request #18-2880 that haven't been released to us yet?

-- Tetra Tech installed three different Radiological Survey Yards close to the building: RSY2 to the east, RSY3 to the south, and RSY4 to the north. (See the attached Tetra Tech / Navy map,



which was part of a public Navy project report for Parcel E.) RSY2, to the east of Building 606, was the closest, and is the subject of several email exchanges provided to us by SFDPH. According to the Navy, soil screening at RSY2 began in July 2007. SFDPH provided us with some radiation air sample data gathered by Tetra Tech between 7/19/2007 and 8/30/2007. Where were these samples taken? Which Radiological Screening Yard (RSY), specifically? Was it RSY2?

-- Also, did Tetra Tech provide any radiation air sample data for September, October, November, or December of 2007, or for any months of 2008, 2009, 2010, and onward? Did the city decide this regular reporting was not necessary? If so, why? If it was considered crucial information, why did the city allow the police to continue to work out of 606?

-- Also, Tetra Tech appears to have provided SFDPH with air sampling data for other chemicals ("TSP, MN, Pb, PM10, and Asbestos") for July and August 2007. Same question: Did Tetra Tech provide the city with this data for any other months during 2007, or any other year? Also, where were these air samples taken -- RSY2 or another RSY yard?

-- On pages 5 and 6 of the file "Request 18-2880 - Vickie Wells Binder.pdf" (see attached file), there is a May 24, 2007 email written by the city industrial hygienist Karen Heckman to two other SFDPH employees. Heckman writes that in a city meeting with Tetra Tech, the company said it would be placing a Radiological Screening Yard next to Building 606. The yard was "quite large, covering the asphalt area to the East of bldg 606 and extending all the way out the pier," with "100 pads on the site, each about 1000 square meters at a soil thickness of 6 inches." Heckman also writes that Tetra Tech's project manager, Bill Dougherty, "indicated that he thought the most contaminated areas have yet to be excavated and material from those excavations would be directed to the new pad yard." Heckman also writes that "At some point, building 606 will be surrounded by the remediation activity on three sides of the building."

In other words, Tetra Tech was building an area next to 606 where contaminated and potentially contaminated soil from all around the shipyard would be brought every day, for up to four years. Heckman then asked a series of questions, beginning with these: "Should the Police continue to operate Building 606 during the activity? Do we believe that there is a potential for Police to be exposed to the radiological or other chemical contamination in the excavated soils?"

We have a number of questions related to the situation Heckman describes in this email:

-- The police employees at 606 were not moved out during this activity. Who decided that they should stay? What analysis was done, if any, to support the decision to keep police employees at Building 606 during the remediation by Tetra Tech?

-- What was the rationale for continuing to keep police and other city employees at Building 606 while it was surrounded on three sides by radiological remediation activity?

-- Heckman asks several other questions in the 5/24/2007 email. One was, "What would happen if we found an exposure?" Did the city plan for this contingency? What was the city's plan for what would happen if the air monitoring found an exposure?

-- Heckman also asks, "What exposure level would be determine[d] to be acceptable for Police Exposures?" Was this question answered? What was the exposure level that the city determined to be acceptable for Police Exposures?

-- Heckman also asks, "What areas of the building would need to be monitored (i.e roof HVAC system intakes, entryways, etc)." Did the city ever answer this question, or decide which areas of Building 606 would need to be monitored? Were any of these areas ever monitored for airborne radiological contaminants during the Tetra Tech remediation activities on three sides of the building?

-- What was the involvement of the SF Mayor's Office in these discussions? In some of the emails, Michael Cohen, Director of Base Reuse and Development at OEWD /Mayor's Office, is copied. And Cohen on 10/16/2007 emailed SFDPH employees and crime lab manager Jim Mudge, writing, "Amy - can we work with Jim Mudge to set up a briefing for Crime Lab staff to help allay their dust fears, Patty - Is there anything we can do to give staff car wash tickets or something?" What was Cohen's role in the city's decision to keep police employees at Building 606 while they were surrounded on three sides by Tetra Tech remediation activities?

-- Does SFDPH believe today that it was the right decision to keep police at 606 instead of moving them out?

-- The communications provided by SFDPH indicate that the city had difficulty obtaining timely information from Tetra Tech about radiation air sample monitoring at the soil pads next to and surrounding Building 606. Heckman mailed a letter to Tetra Tech's Bill Dougherty on 5/31/2007 and followed up on the phone, and on June 20, 2007, Vickie Wells wrote, "At some point we may need to ask the POA to help us press for the information." Is it usual for the city to rely on the police union to get basic safety information affecting the health of its workers? Was the city concerned about Tetra Tech's lack of communication at this point in the process?

-- Heckman asked the Navy's Ralph Pearce to provide weekly results of radiation air monitoring sampling at the RSY next to Building 606. Pearce wrote in an email on 8/6/2007 that the Navy wouldn't provide this information and that instead the city would have to get it directly from Tetra Tech, from the same person who had been delaying in providing the information earlier (Bill Dougherty). Was the city concerned about the Navy's decision not to provide weekly radiation air sampling data?

-- On 9/4/2007, Vickie Wells wrote in a memo to SFPD Deputy Chief Charles Keohane that Tetra Tech had provided some radiation monitoring data to the city and that the levels looked OK according to established regulatory standards. Wells also wrote, "We have some concerns regarding the length of time to receive these results and will ask the Navy to provide the results in a more timely manner." What was the result of that request? Did the Navy provide more timely radiation monitoring results after that?

-- On 11/27/2007, Karen Heckman wrote to another SFDPH employee that she was still having trouble getting radiation monitoring data from Tetra Tech and the Navy: "You may want to have Mike continue to pursue the request for data. I've never heard anything back from Bill. I'll mention this to him at the meeting today, but unless there gets raised [sic] to level of Ralph's attention, again, I don't think Bill will respond." Who is "Mike" in this email? Is it Michael Cohen in the Mayor's Office? Also, was the city concerned that it couldn't get updated and timely radiation monitoring data from Tetra Tech? And how was this problem resolved, if it was resolved? Are there later communications from or with Tetra Tech's Bill Dougherty that have not been provided to us?

-- On 11/27/2007, a number of city staffers met at Hunters Point with Bill Dougherty to prepare for a meeting the next day with Building 606 occupants. Was the issue of the missing radiation

monitoring data mentioned at this meeting? If so, what did Dougherty say?

-- Where was the 11/27/2007 meeting held? According to a 11/20/2007 email from Amy Brownell, she assumed "we will meet in the Tetrattech trailers." Did the meeting take place in the Tetra Tech trailers at the site?

-- In a 10/18/2007 email, Karen Heckman writes that at the upcoming meeting with Building 606 residents to alleviate their concerns about hazardous exposure, "Amy will likely present the information for Lennar regarding the particulate and NOA monitoring data as well as BAAQMD requirements for the community monitoring locations." The phrasing here -- that SFDPH's Amy Brownell will give a presentation "for Lennar" -- seems to suggest that a city public health employee is serving as a surrogate for a developer. Was that the case? Was this standard practice? Why wouldn't Lennar present the information itself?

-- During the city's 11/28/2007 meeting with Building 606 occupants to alleviate their concerns about potential exposure to hazardous materials, did SFDPH officials tell them about any of the difficulties that the department had been having in its communications with Tetra Tech? Did SFDPH tell the Building 606 occupants that Tetra Tech was not providing radiation monitoring data? Did SFDPH tell the Building 606 occupants that the city only had a few snapshots of radiation monitoring data from certain points in time and was not able to monitor the airborne radiation levels on an ongoing basis? What were the 606 occupants told?

-- Was SFDPH performing any independent air monitoring near Building 606 at the time? SFDPH did monitor the air on Parcel A for asbestos fibers during the Lennar construction and regrading that was happening around the same time. If SFDPH wasn't doing its own air monitoring near Building 606, why not? If the city decided it was important for to monitor the air on Parcel A for asbestos fibers, why wasn't it also important for the city to monitor the air near Building 606 for airborne radioactive contaminants, when there were 100+ city employees were working in an office next door?

-- Bill Dougherty was Tetra Tech's project manager at Hunters Point, and he was the city's main point of contact for essential data important to the safety of city workers at Building 606. Since then, two Tetra Tech supervisors have gone to federal prison after admitting that they swapped soil samples and lied about it on project documents, and both the Navy and the EPA have said that all of Tetra Tech's radiation measurements are unreliable and its radiation work has to be re-checked. Does the city think that the few radiation air sample measurements it received from Tetra Tech in 2007 are accurate and free of potential fraud? If so, what is the city's basis for believing that this data remains accurate?

-- By 2010, with city employees still working at Building 606, Tetra Tech and the Navy had installed three different Radiological Survey Yards close to the building (RSY2, RSY3, and RSY4). With three RSYs near Building 606, why didn't the city vacate the building?

Thanks for your attention to these questions.

We have attached these same questions in a Microsoft Word .docx file in case the formatting in this email makes them difficult to read.

Again, we need answers by end of the day Friday.

Jason Fagone and Cynthia Dizikes  
Chronicle reporters

## Cretan, Jeff (MYR)

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**From:** McKinney, Kasheica (CII)  
**Sent:** Monday, September 24, 2018 3:15 PM  
**To:** Kagan, Rachael (DPH); Calvino, Maria Soledad; Franklin, William D CIV NAVFAC HQ, BRAC PMO; Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR);  
juanita.bacey@dtsc.ca.gov; LEE, LILY; Robinson, Derek J CIV NAVFAC HQ, BRAC PMO  
**Subject:** OCII Response to Examiner Inquiry

### OCII responses to inquiry

**Sent:** Friday, September 21, 2018 4:54 PM  
**To:** Laura Waxmann <[lwaxmann@sfmediaco.com](mailto:lwaxmann@sfmediaco.com)>  
**Subject:** Re: Block 56/Shipyard Media Inquiry

Hello Laura,

Please see the responses below to your inquiries concerning Hunters Point Shipyard Block 56.

1) Block 56 is partially owned by OCII and partially by Lennar, correct?

**Answer: OCII owns the portion of Block 56 designated as an affordable housing site that is being offered for development by this RFP. Lennar has constructed market rate for sale housing on the remainder of the block.**

2) The Lennar Welcoming Center is located on the portion owned by OCII and will be demolished ahead of the affordable housing development, correct?

**Answer: The Welcome Center is located on the portion of the block owned by OCII and it will be demolished prior to construction start of the affordable housing.**

3) What is OCII's timeline for the affordable housing project?

**Answer: The project will go to the OCII Commission for selection of a developer early next year. Construction will not start for at least 2 years and we anticipate it will take 20-24 months to build.**

4) Has the the land that will be developed into the affordable housing been previously tested for radioactive and other types of contamination? If so, to what extent?

**Answer: As of September 2018, the California Department of Public Health (CDPH) has performed radiological surveys of over 90% of all open and accessible areas on Parcel A-1 commonly referred as the "Hilltop", including Block 56. All results available to date show that all the surveyed areas (including Block 56) are safe and pose no health or safety hazard to residents, tenants, workers, or visitors of the Shipyard.**

**Additionally, in 2002, the EPA also performed a radiological survey at Parcel A. Please consult the EPA for additional information on the scan they performed.**



**For information on testing performed prior to the transfer of Parcel A, please consult with the Navy and the EPA.**

5) Given the recent finding of a radium dial on Parcel A, is more testing planned before new construction will be undertaken on Parcel A?

**Answer: CDPH has not completed their scan of Parcel A. CDPH has conducted radiation scans of over 90% of all the accessible open areas, including all of the streets, parks and open spaces, and the common areas on Parcel A-1; this includes Block 56. All results available to date show that all the surveyed areas are safe and pose no health or safety hazard to residents, tenants, workers, or visitors of the Shipyard. The areas of Parcel A-1 not yet scanned, including those that are currently under vertical construction are scheduled to be scanned in the coming weeks.**

**The CDPH is committed to a thorough investigation of Parcel A. CDPH continues to evaluate their scope of work to ensure that the testing will provide meaningful and comprehensive results. OCII appreciates CDPH's technical expertise and will look to their recommendations.**

6) Residents and community advocates, as well as D10 supervisor candidates, have called for all construction to be halted on the shipyard, including at Parcel A. How has OCII assessed Block 56 to be safe for development?

**Answer: CDPH has conducted radiation scans of over 90% of all the accessible areas, including all of the streets, parks and open spaces, and the common areas on Parcel A-1, including Block 56. All results available to date show that all the surveyed areas are safe and pose no health or safety hazard to residents, tenants, workers, or visitors of the Shipyard.**

**Construction of Block 56 will not begin before the year 2020. The radiation scan and full report by CDPH would be complete well in advance of any construction. If any new information is presented during that time, OCII will adjust the development planning accordingly.**

Please let me know if you need anything else from OCII at this time.

Thank you,

## Cretan, Jeff (MYR)

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**From:** Franklin, William D CIV NAVFAC HQ, BRAC PMO <william.d.franklin@navy.mil>  
**Sent:** Friday, September 21, 2018 5:36 PM  
**To:** Kagan, Rachael (DPH); Calvino, Maria Soledad; Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); juanita.bacey@dtsc.ca.gov; McKinney, Kasheica (CII)  
**Cc:** LEE, LILY  
**Subject:** RE: [Non-DoD Source] RE: EPA response to SF Chronicle inquiry

Thanks Rachael & Soledad. Much appreciated. R, Bill

R, Bill FYI Franklin

Public Affairs Officer  
Navy Base Realignment  
& Closure Office (BRAC)  
william.d.franklin@navy.mil  
(D) 619-524-5433  
(C) 619-548-3128

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**From:** Kagan, Rachael (DPH)  
**Sent:** Friday, September 21, 2018 5:18:25 PM  
**To:** Calvino, Maria Soledad; Franklin, William D CIV NAVFAC HQ, BRAC PMO; Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR); juanita.bacey@dtsc.ca.gov; McKinney, Kasheica (CII)  
**Cc:** LEE, LILY  
**Subject:** [Non-DoD Source] RE: EPA response to SF Chronicle inquiry

Thank you.

Here is what SFDPH sent – answers and questions.

Rachael

9/20/18 response to Chronicle

• The San Francisco Health Department stands with the community. We support all efforts to ensure that Parcel A residents feel safe and are safe, including additional scanning and testing by the California Department of Public Health. We will continue to work with the Parcel A residents, State Health Department and the EPA to ensure that Parcel A is safe for current and future residents and workers.

• As the San Francisco Health Officer, Dr. Tomas Aragon puts the health and safety of San Franciscans above all else. Recently Dr. Aragon responded to several individuals who contacted him directly via email to express their views on Parcel A at the Hunters Point Shipyard. Some of them apparently shared the exchanges with the media.

- Specific questions about the scan should be directed to CDPH, and questions about the deck marker to CDPH and the Navy. We understand that no one was exposed to any hazards from the deck marker, which was buried under ground, found during the scan, and removed by the Navy, leaving the remaining soil clear. We do not know why you have characterized the marker as “highly” radioactive – that information did not come from any of the agencies that are involved or studying the marker. According to CDPH, the object was producing a relatively low level of radiation, with a reading of 0.09 mrem (mR) per hour. For comparison, an individual would receive 3.5 mR on a flight from Los Angeles to New York (source: US Centers for Disease Control) or 1.5 mR during a dental x-ray (source: US Nuclear Regulatory Commission). As you can see from the comparison, if anyone had been exposed to the marker, which they were not, it contains levels of radiation lower than found in these examples from everyday life.

- We do not have a final report from the independent expert who is measuring the deck marker for SFDPH. We have added that extra layer of study as part of our commitment to the community. When we have the final report, we will make the findings available.

- As we previously stated in the statement provided to you on 9/13, we support the state’s scan of Parcel A, and residents of Parcel A can be assured that everything is being done to ensure the site is safe. We thank the California Department of Public Health for their continued work in verifying the safety of the area, in searching for hazards and responding immediately to the results of the scan, and keeping the Parcel A residents informed throughout the project. We will continue to work with Parcel A residents to ensure their questions are answered and their needs are met.

#### 9/19/18 Chronicle questions

We're working on a follow-up story about the radium deck marker discovered Sept. 7 on Parcel A and questions/concerns about what it means. A couple questions for SFDPH:

-- Does SFDPH have a position on what should happen next with the state walkover survey of Parcel A? Given the finding of the deck marker, should the current survey be changed or expanded, to make it more thorough?

-- Is SFDPH concerned that there might be other contamination on the parcel -- radiological, chemical, or biological -- that has been missed before, like the deck marker was missed? If not, why not?

-- We've been provided an email exchange between Tomás J. Aragón and Bradley Angel, David Anton, and Steve Castleman. In the exchange, Aragón writes a few things we wanted to ask about. One is that "Next week we will have

more information about the item (from an independent health physicist hired by SFDPH) so that we can characterize the exposure risk." Can you give us more information about who this person is and what they will be doing to analyze the item and the exposure risk? If they are already working on it, can we talk to them?

-- Aragón repeats what SFDPH has already said about the radium deck marker (buried 10.5 inches, fenced-off area, no "immediate exposure or health risk" to residents). He also appears to say something new: "We agree that the radioluminescent deck marker is a hazardous item and no one --- workers, residents, including children --- should be unintentionally exposed to hazardous items." Also, "We agree with concerns and questions that are raised regarding (a) how this happened, (b) what it means (are there more?), and (c) how this affects testing plans moving forward." First, can you confirm that these quotes are accurate and do come from an email written by Aragón? And second, can SFDPH elaborate on the concerns that Aragón mentions here, and why they apparently haven't been communicated to the public yet? Does SFDPH have a theory about how the deck marker got there in the first place?

-- If SFDPH thinks the deck marker is a "hazardous item" and has questions about "are there more," what does this mean for any construction workers who are currently working on the parcel as part of homebuilding activities? Are they at risk?

From: Calvino, Maria Soledad [mailto:Calvino.Maria@epa.gov]  
Sent: Friday, September 21, 2018 10:52 AM  
To: Franklin, William D CIV NAVFAC HQ, BRAC PMO <william.d.franklin@navy.mil>; Kagan, Rachael (DPH) <rachael.kagan@sfdph.org>; Dale.Schornack@cdph.ca.gov; Cretan, Jeff (MYR) <jeff.cretan@sfgov.org>; juanita.bacey@dtsc.ca.gov; McKinney, Kasheica (CII) <kasheica.mckinney@sfgov.org>  
Cc: LEE, LILY <LEE.LILY@EPA.GOV>  
Subject: EPA response to SF Chronicle inquiry

Good morning PIO team,  
FYSA— Below is the statement that EPA sent to the SF Chronicle yesterday.

Question:

We're working on a follow-up story about the radium deck marker on Parcel A and questions/concerns about what it means. We just want to know if EPA has a position on what should happen next with the walkover survey of Parcel A. Due to the finding of the deck marker, should the CDPH radiation survey be changed or expanded, to make it more thorough? And does EPA think there might be other contamination on the parcel -- radiological, chemical, or biological -- that has been missed in prior searches?

Response:

EPA is working with its regulatory partners, the State of California Department of Public Health and Department of Toxic Substances Control, and the Navy to determine how the site cleanup needs to be adjusted. EPA supports the new actions already in progress to complete scanning portions of Parcel A that are currently under construction starting in the next few weeks, which is a faster timeline than originally planned. To address uncertainty, EPA is working hard with other regulators and the Navy to explore all options as soon as possible to make the radiological testing process more thorough at the Hunters Point site.

EPA remains committed to ensuring that the Bayview-Hunters Point community is protected from harmful exposure to radiation and that the Hunters Point Naval Shipyard Superfund site can be safely used for work, recreation, and residential purposes.

Best,  
Soledad Calvino  
Press Officer | Office of Public Affairs U.S. Environmental Protection Agency | Region 9  
calvino.maria@epa.gov<mailto:calvino.maria@epa.gov>  
Office 415.972.3512 | Mobile 415.697.6289



## Cretan, Jeff (MYR)

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**From:** Robinson, Derek J CIV NAVFAC HQ, BRAC PMO <derek.j.robinson1@navy.mil>  
**Sent:** Thursday, September 20, 2018 9:13 PM  
**To:** Dale.Schornack@cdph.ca.gov; Calvino.Maria@epa.gov; Kagan, Rachael (DPH); McKinney, Kasheica (CII); Bacey, Juanita@DTSC; Cretan, Jeff (MYR); Slater, James G CIV NAVSEA, SEA 00D; O'Connor, Rory CIV NAVSEA, SEA 00D; Cooper, Anthony CIV NAVFAC HQ, PAO; Deloach, Whitney E CIV NAVFAC HQ, PAO; de Vera, Ryan P LCDR CHINFO, OI-3; Sears, Christina H LT CHINFO, OI-3  
**Cc:** Franklin, William D CIV NAVFAC HQ, BRAC PMO  
**Subject:** SF Chronicle response

Navy and Agency PIOs,

The below response from the Navy was sent to the SF Chronicle earlier today. FYSA.

Best Regards,  
Derek

-----Original Message-----

From: Franklin, William D CIV NAVFAC HQ, BRAC PMO  
Sent: Thursday, September 20, 2018 12:08 PM  
To: 'Fagone, Jason' <Jason.Fagone@sfchronicle.com>  
Cc: Dizikes, Cynthia <CDizikes@sfchronicle.com>  
Subject: RE: request for comment from the SF Chronicle on the deck marker

Jason, our response is below. Please attribute it to Mr. Derek Robinson. There is also a questions and answer sheet about the deck marker you may be interested in at:

[https://www.bracpmo.navy.mil/brac\\_bases/california/former\\_shipyard\\_hunters\\_point/timely\\_topics.html](https://www.bracpmo.navy.mil/brac_bases/california/former_shipyard_hunters_point/timely_topics.html)

R, Bill

=====Response to 19 Sept. 2018 Query===== Parcel A was used historically for housing and administrative buildings; scanning results collected to date continue to confirm that that radiological activities did not occur there. Man-made sources from historical Navy activities have not been discovered in the developed and occupied residential areas. There has been no evidence of soil contamination.

The sensitive equipment used by the California Department of Public Health (CDPH) can detect items located below the surface that could expose residents to radiation, as evidenced by the detection of the underground, low-level deck marker as well as very minor anomalies such as naturally occurring Potassium-40 in woodchips.

The Navy and CDPH are committed to a thorough investigation of Parcel A and are close to completing scans of the accessible areas. CDPH is evaluating their scope of work to determine if additional tests could provide meaningful results. The Navy appreciates CDPH's technical expertise and will support their recommendations.

-----Original Message-----

From: Fagone, Jason <Jason.Fagone@sfchronicle.com>

Sent: Wednesday, September 19, 2018 2:51 PM  
To: Franklin, William D CIV NAVFAC HQ, BRAC PMO <william.d.franklin@navy.mil>  
Cc: Dizikes, Cynthia <CDizikes@sfchronicle.com>  
Subject: [Non-DoD Source] request for comment from the SF Chronicle on the deck marker

Hi Bill,

We're working on a follow-up story about the radium deck marker on Parcel A and questions/concerns about what it means. We wanted to ask if the Navy has a position on what should happen next with the CDPH walkover survey of Parcel A. Given the finding of the deck marker, should the current survey be changed or expanded, to make it more thorough? And does the Navy think there might be other contamination on the parcel -- radiological, chemical, or biological -- that has been missed in prior searches? If not, why not?

Thanks. We would need a response by noon tomorrow.

--

Jason Fagone

Reporter, San Francisco Chronicle

jason.fagone@sfchronicle.com

office phone: 415-777-6018

## Cretan, Jeff (MYR)

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**From:** Kagan, Rachael (DPH)  
**Sent:** Thursday, September 20, 2018 7:19 AM  
**To:** Cretan, Jeff (MYR)  
**Subject:** Re: Parcel A, shipyard

Sounds good. Thanks.

Sent from my overrated iPhone

On Sep 20, 2018, at 6:15 AM, Cretan, Jeff (MYR) <[jeff.cretan@sfgov.org](mailto:jeff.cretan@sfgov.org)> wrote:

Yes, I can talk around 10:30?

---

**From:** Kagan, Rachael (DPH)  
**Sent:** Thursday, September 20, 2018 6:08:05 AM  
**To:** Cretan, Jeff (MYR)  
**Subject:** Parcel A, shipyard

Jeff,

SF Chronicle is working on another story about the item found at Parcel A.

Also, There was a meeting last night with the residents that DPH attended, along with CDPH and other agencies. I will be briefed on it this morning. Do you have time for a phone call today to touch base?

Thanks  
Rachael

Sent from my overrated iPhone

## Cretan, Jeff (MYR)

---

**From:** Vien, Veronica (DPH)  
**Sent:** Monday, September 17, 2018 5:02 PM  
**To:** Kagan, Rachael (DPH); Andrew, Brent (DPH); Wagner, Greg (DPH); Aragon, Tomas (DPH); Cushing, Stephanie (DPH); Fosdahl, Patrick (DPH); Bobba, Naveena (DPH); Brownell, Amy (DPH); Sesay, Nadia (CII); McKinney, Kasheica (CII); Cretan, Jeff (MYR); Kittler, Sophia (BOS)  
**Subject:** RE: Hunters Point Parcel A coverage

Hi everyone,

Here is a roundup of the news coverage from over the weekend.

**SF Gate:** <https://m.sfgate.com/bayarea/article/Navy-s-Hunters-Point-retesting-plan-draws-on-13232708.php?t=9d1a951abd>

**KTVU:** <https://www.chron.com/news/media/Radioactive-material-discovered-at-SF-Naval-1341270.php>

**Bay City News:** <https://m.sfgate.com/news/bayarea/article/Deck-Marker-Containing-Radium-Discovered-At-Naval-13231054.php>

**KRON:** <https://www.kron4.com/news/bay-area/highly-radioactive-object-found-at-former-hunters-point-naval-shipyard/1445934818>

**SF Examiner:** <http://www.sfexaminer.com/shipyard-residents-advocates-call-testing-radioactive-discovery/>

**KGO/ABC:** <https://abc7news.com/radioactive-object-found-near-hunters-point-homes/4246335/>

Happy Monday.

Veronica Vien

**From:** Vien, Veronica (DPH)  
**Sent:** Friday, September 14, 2018 4:41 PM  
**To:** Kagan, Rachael (DPH) <rachael.kagan@sfdph.org>; Andrew, Brent (DPH) <brent.andrew@sfdph.org>; Wagner, Greg (DPH) <greg.wagner@sfdph.org>; Aragon, Tomas (DPH) <tomas.aragon@sfdph.org>; Cushing, Stephanie (DPH) <Stephanie.Cushing@sfdph.org>; Fosdahl, Patrick (DPH) <Patrick.Fosdahl@sfdph.org>; Bobba, Naveena (DPH) <naveena.bobba@sfdph.org>; Brownell, Amy (DPH) <Amy.Brownell@sfdph.org>; Sesay, Nadia (CII) <nadia.sesay@sfgov.org>; McKinney, Kasheica (CII) <kasheica.mckinney@sfgov.org>; Cretan, Jeff (MYR) <Jeff.Cretan@sfgov.org>; Kittler, Sophia (BOS) <sophia.kittler@sfgov.org>  
**Subject:** Hunters Point Parcel A coverage

Hi everyone,

There has been some news coverage of Parcel A at the HP Shipyard. I will continue circulating clips to you as they come up.

**KPIX/CBS:** <https://sanfrancisco.cbslocal.com/2018/09/14/small-radioactive-object-discovered-at-controversial-hunters-point-development/>

**NBC:** [https://www.nbcbayarea.com/investigations/Deck-Marker-Containing-Radium-Found-at-Hunters-Point-493223921.html?\\_osource=mobilesharebar](https://www.nbcbayarea.com/investigations/Deck-Marker-Containing-Radium-Found-at-Hunters-Point-493223921.html?_osource=mobilesharebar)

**SF Chronicle:** <https://www.sfchronicle.com/bayarea/article/Radioactive-object-found-near-homes-at-Hunters-13228476.php>

**SF Gate:** <https://m.sfgate.com/bayarea/article/Radioactive-object-found-near-homes-at-Hunters-13228476.php?t=2e573abda3>

**KCBS radio:** <https://kcbsradio.radio.com/media/audio-channel/radium-found-buried-object-near-homes-sf-shipyard>

Thank you,

Veronica Vien  
Public Records Officer  
San Francisco Dept. of Public Health  
415.554.2566



## Cretan, Jeff (MYR)

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**From:** Cretan, Jeff (MYR)  
**Sent:** Thursday, December 20, 2018 1:08 PM  
**To:** Dizikes, Cynthia  
**Subject:** Re: San Francisco Chronicle Follow Up

That's fine. Thank you, Cynthia

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**From:** Dizikes, Cynthia <cdizikes@sfchronicle.com>  
**Sent:** Thursday, December 20, 2018 1:07 PM  
**To:** Cretan, Jeff (MYR)  
**Subject:** Re: San Francisco Chronicle Follow Up

Got this Jeff, thanks for sending. We will note that the Mayor did not answer specific questions about Brownell's actions and that you sent this general statement.

Thanks,

Cynthia

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**From:** "Cretan, Jeff (MYR)" <jeff.cretan@sfgov.org>  
**Date:** Thursday, December 20, 2018 at 12:49 PM  
**To:** "Dizikes, Cynthia" <CDizikes@sfchronicle.com>  
**Subject:** Re: San Francisco Chronicle Follow Up

Hi Cynthia

Here's a statement you can attribute to me. Happy to talk more off the record if you want.

Statement:

The Mayor's focus is and will continue to be to protect the health and well-being of all the people of San Francisco, including those who are currently living and working in the Shipyard. It is the duty of our Department of Public Health and its officers to respond to questions from any member of the public regarding public health issues regardless of how that inquiry comes in. We are working with DPH and other city agencies to provide the public with information and to ensure that we can answer any questions for people about the Shipyard.

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**From:** Dizikes, Cynthia <cdizikes@sfchronicle.com>  
**Sent:** Thursday, December 20, 2018 9:19 AM  
**To:** Cretan, Jeff (MYR)  
**Cc:** Fagone, Jason  
**Subject:** Re: San Francisco Chronicle Follow Up

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Jeff,

Story may be up online as early as today, so we need your statement as soon as possible. Thanks again,

Cynthia

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**From:** "Dizikes, Cynthia" <CDizikes@sfchronicle.com>  
**Date:** Tuesday, December 18, 2018 at 10:47 AM  
**To:** "Jeff.Cretan@sfgov.org" <Jeff.Cretan@sfgov.org>  
**Cc:** "Fagone, Jason" <Jason.Fagone@sfchronicle.com>  
**Subject:** Re: San Francisco Chronicle Follow Up

Hey Jeff,

Just tried to call you back. We just obtained an email Amy Brownell sent to a Shipyard homebuyer in September 2016 that we wanted to get your response to. In the email, she criticizes the early investigative reporting on the Tetra Tech fraud and tells the homebuyer not to put any stock in it. NBC Bay Area was covering the story at the time, interviewing whistleblowers, and as you know, many of these whistleblower allegations have since been confirmed by federal investigations. Brownell is basically calling the fraud scandal fake news. Is this appropriate? Does the mayor agree?

In the larger context, we spoke about questions that have been raised about Brownell's objectivity on this project – statements she has made that later turned out to be incorrect, public documents she didn't provide and assurances she gave (both to homeowners and to the public) that go beyond what even the EPA or the Navy have said. Does the mayor think this email further speaks, in any way, to Brownell's fitness as a liaison to the San Francisco public and communicator on this project?

Thanks again,

Cynthia

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**From:** "Dizikes, Cynthia" <CDizikes@sfchronicle.com>  
**Date:** Tuesday, December 18, 2018 at 9:11 AM  
**To:** "Jeff.Cretan@sfgov.org" <Jeff.Cretan@sfgov.org>  
**Cc:** "Fagone, Jason" <Jason.Fagone@sfchronicle.com>  
**Subject:** Re: San Francisco Chronicle Follow Up

Hey Jeff,

Sorry I missed your call yesterday. Here at my desk to discuss if you need clarification (415) 777-7923.

Thanks,

Cynthia

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**From:** "Dizikes, Cynthia" <CDizikes@sfchronicle.com>  
**Date:** Monday, December 17, 2018 at 12:24 PM  
**To:** "Jeff.Cretan@sfgov.org" <Jeff.Cretan@sfgov.org>

**Cc:** "Fagone, Jason" <Jason.Fagone@sfgchronicle.com>

**Subject:** San Francisco Chronicle Follow Up

Hi Jeff,

We wanted to follow up with Mayor Breed on our story that ran over the weekend related to a key health department official's involvement in home sales at the former Hunters Point Naval Shipyard.

Several experts who we spoke to said that this official, Amy Brownell, has a conflict of interest in these matters and that her involvement in these transactions raises serious ethical and legal questions.

If you have not seen the story yet, you can read it here:

<https://www.sfgchronicle.com/green/article/Chronicle-Investigation-SF-health-official-13462076.php>

We would like to talk to Mayor Breed about her reaction to Ms. Brownell's involvement in these home sales. Specifically, does Mayor Breed think this practice is problematic, or wrong, and should be discontinued? If not, why not? If so, why, and how will the Mayor end this practice?

The experts we spoke to also pointed out that Ms. Brownell was withholding relevant documents from potential shipyard homebuyers that she was legally obligated to provide to them as public records. What is the Mayor's reaction to this point? Was it wrong for Ms. Brownell not to provide all relevant public records related to the shipyard cleanup and development? If this practice does continue, will the Mayor ensure that all relevant records are provided to potential shipyard homebuyers? If so, how?

We are working on a follow up to this story and need to talk to the Mayor by tomorrow at the latest.

Thank you,

Cynthia and Jason

## Geithman, Kyra (MYR)

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**From:** MayorsPressOffice, MYR (MYR)  
**Sent:** Tuesday, August 21, 2018 14:19  
**To:** Charlene Muhammad  
**Subject:** RE: Urgent request for phone interview  
**Attachments:** 7.26.18 Hunters Point Shipyard.pdf

Hi Charlene – attached is the statement that Mayor Breed issued regarding the Hunters Point Shipyard development.

**From:** Charlene Muhammad [mailto:fcnwest@yahoo.com]  
**Sent:** Monday, August 20, 2018 12:57 PM  
**To:** MayorsPressOffice, MYR (MYR) <mayorspressooffice@sfgov.org>  
**Subject:** Urgent request for phone interview

Dear Press Team:

Can you set up a **5-10 minute max phone interview** with Mayor London Breed regarding what's happening with the toxic/radiated Naval shipyard in Bay View Hunters Point for my national story in the Black Press. I understand residents filed a \$27 billion class action lawsuit against the company hired by the Navy to clean up the site, and some 2,000 more plaintiffs have been added. Also the San Francisco Police Department is calling for retesting of soil, oil and water due to its crime lab being situated on one of the parcels. In something related but not directly, I also see that residents of a new Lennar development in Hunters Point has filed a lawsuit against them alleging they did not disclose the toxicity. I'd like to get the Mayor's thoughts about the issue and its impact on her city, and any plans she may have to address what's happening or if she has already.

My story is due tomorrow at noon PST. I'm working around the clock on it.

Thank you in advance for any assistance you may provide!

Sincerely,

Charlene Muhammad  
National Correspondent  
The Final Call Newspaper  
323-602-9841 direct  
[www.FinalCall.com](http://www.FinalCall.com)



**FOR IMMEDIATE RELEASE:**

Wednesday, July 26, 2018

Contact: Mayor's Office of Communications, 415-554-6131

**\*\*\* STATEMENT \*\*\***

**MAYOR LONDON BREED ON STATUS OF HUNTERS POINT  
SHIPYARD**

"As Mayor, the health and safety of all San Franciscans, including the residents of the Bayview Hunters Point community, is my highest concern.

The falsification of testing data by Navy-contracted employees at the Hunters Point Shipyard is serious and unacceptable, and I was relieved that justice was served earlier this year when two individuals who engaged in these fraudulent activities were convicted. I want to assure all residents that no construction is currently taking place on any of the parcels. Furthermore, as a result of the hearing co-sponsored by Supervisor Cohen, testing on Parcel A has begun and will continue through the fall of 2018.

The development of the Hunters Point Shipyard and the community benefits associated with the project, including new affordable housing, jobs, parks, and community facilities, are important to the City and the Bayview Hunters Point community. But nothing is more important than our residents' safety. I want to be clear, San Francisco is committed to a comprehensive and transparent re-testing process of the Hunters Point Shipyard and to working closely with local, state, and federal regulators including the Navy, the Environmental Protection Agency, the Department of Toxic Substances Control, California Department of Public Health, San Francisco Department of Public Health, and community stakeholders to ensure that any property transferred to the City for development is absolutely safe."

###



## Geithman, Kyra (MYR)

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**From:** Rachel Becker <rachel.becker@theverge.com>  
**Sent:** Friday, September 28, 2018 12:54  
**To:** Cohen, Malia (BOS); Chisti, Aliya (BOS); Kittler, Sophia (BOS); Pena, lowayna (BOS)  
**Cc:** Hussey, Deirdre (MYR); MayorsPressOffice, MYR (MYR)  
**Subject:** Re: Press inquiry from The Verge: Cleanup and risks at Hunters Point

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello! Just following up. I also wanted to ask how long the Shipyard project will be stalled during the Navy's retesting, and how much this delay is anticipated to cost the developers and the city? Also, is Parcel A safe? What about the rest of the Shipyard? And how was the falsification of results by Tetra Tech workers allowed to happen in the first place?

Thank you, my deadline is first thing on Thursday October 4th.

Rachel

On Tue, Sep 25, 2018 at 11:13 AM Rachel Becker <[rachel.becker@theverge.com](mailto:rachel.becker@theverge.com)> wrote:

Hello! I'm a science journalist at The Verge, a Vox Media web publication about science, technology, and culture, and I'm working on a video for our Verge Science YouTube channel about the environmental contamination and the cleanup at the Hunters Point Shipyard. I understand that there's a lot of controversy about the risks, mishandled test samples, and re-testing. I'd love to speak with you to understand what happened, the risks and plans to mitigate those risks are going forward, and how this will affect the local community and development in the area. My deadline is next Thursday, October 4th. Would there be a good time for me to give you a phone or Skype call before then?

Thank you,

Rachel Becker

--

*Science Journalist, The Verge*  
Tel: 650 485 1493  
*@RA\_Becks*

*The Verge, founded in 2011, covers technology, science and art.*

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*Science Journalist, The Verge*  
Tel: 650 485 1493  
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*The Verge, founded in 2011, covers technology, science and art.*

## Lynch, Andy (MYR)

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**From:** Barnes, Maximilian (CII)  
**Sent:** Wednesday, November 28, 2018 4:31 PM  
**To:** Cretan, Jeff (MYR); Lynch, Andy (MYR)  
**Subject:** OCII Draft Press Release Parcel A - HPS  
**Attachments:** 11.29.18 Parcel A-1 testing complete.docx

Hello Jeff and Andy,

Please find attached the draft press release OCII plans on issuing tomorrow regarding the California Department of Public Health's scan of HPS Parcel A-1, pending any edits.

Give me a call if you have any questions.

Thank you,  
Max



**Max Barnes**  
**Project Associate/ Media & Public Relations**

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**FOR IMMEDIATE RELEASE:**

Thursday, November 29, 2018

Contact: Max Barnes, PR & Media Relations OCII

[maximilian.barnes@sfgov.org](mailto:maximilian.barnes@sfgov.org)

**\*\*\* PRESS RELEASE \*\*\***

**CALIFORNIA DEPARTMENT OF PUBLIC HEALTH (“CDPH”)  
COMPLETES RADIATION HEALTH AND SAFETY SCANNING ON  
HUNTERS POINT NAVAL SHIPYARD PARCEL A-1**

*CDPH scan confirms no health or safety risks to members of the Parcel A-1 residential community*

**San Francisco**— On November 16, 2018, the California Department of Public Health (CDPH) released a Hunters Point Shipyard (HPS) Parcel A-1, Radiation Health and Safety Scanning Survey Final Progress Report. The report summarizes the results of the radiological survey CDPH conducted between July 16, 2018 and October 26, 2018 of the “Hilltop” at HPS.

The CDPH survey results to date have found no radiation health or safety risks to residents, workers, or tenants on Parcel A-1 of the Hunters Point Naval Shipyard.

CDPH conducted the survey under a July 16, 2018 work plan prepared by its Radiological Health Branch. It involved a walkover scan and towed array scan of the publically accessible areas (uncovered areas, landscaped areas, streets and sidewalks) as well as private common areas between homes, a large stockpile, and slopes.

The only non-naturally occurring element CDPH detected was associated with a naval deck marker that was buried under approximately 10 inches of soil, located near Galvez and Donahue at the bottom of the hill on the north side of Parcel A-1 in an undeveloped, fenced, non-public area. CDPH measured the level of radiation emitted from the deck marker and determined that the amount of radiation from the deck marker would not have resulted in a health or safety hazard to anyone who happened to be at that spot previously. A Navy contractor removed the deck marker under CDPH observation. Scans of the hole that contained the deck marker and of the removed soil around the deck marker detected no radiation above background levels, which indicated that the deck marker was intact and that no radium leaked out of the marker.

Potassium-40, which CDPH detected 88 times while scanning, is a naturally occurring element normally found throughout nature, including in plants, animals, various foods and our bodies. CDPH advises that detection of potassium-40 is not unusual for a radiation scan of this type and is not a health or safety concern for people living, working, or visiting on the Shipyard, or for the environment.

To read CDPH’s Final Progress Update on the Parcel A-1 scan, go to [www.cdph.ca.gov](http://www.cdph.ca.gov)

###

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## Lynch, Andy (MYR)

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**From:** Cretan, Jeff (MYR)  
**Sent:** Thursday, December 20, 2018 4:18 PM  
**To:** Lynch, Andy (MYR)  
**Subject:** FW: B606 story  
**Attachments:** Sf Chronicle story 12 20 18 annotated.docx; DPH response to Chronicle re B606 Dec tests.docx

-----Original Message-----

From: Kagan, Rachael (DPH)  
Sent: Thursday, December 20, 2018 11:51 AM  
To: Stevenson, David (POL) <david.c.stevenson@sfgov.org>; Cretan, Jeff (MYR) <jeff.cretan@sfgov.org>; Reisman, Will (PUC) <WReisman@sfgwater.org>  
Subject: RE: B606 story

Here is the story, with annotations. Take a look and see what you think. If you have additional comments, please feel free to make them.

We can consider next steps.

Also attached are the DPH responses to the questions that went into this story. I also included PUC's response from yesterday re water testing.

Thanks,  
Rachael

-----Original Message-----

From: Kagan, Rachael (DPH)  
Sent: Thursday, December 20, 2018 6:53 AM  
To: Stevenson, David (POL) <david.c.stevenson@sfgov.org>; Cretan, Jeff (MYR) <jeff.cretan@sfgov.org>; Will Reisman <will.reisman@sfgov.org>  
Subject: B606 story

In today's Chron contains many inaccuracies.

I will highlight those later this morning and circulate. I thought you all might want to do the same.

We can consider next steps.

Thanks  
Rachael

Sent from my overrated iPhone



*Note: These reporters seem determined to portray Building 606 as unsafe, and reject any information that does not tell that story. The Health Department, PUC and the Police have provided voluminous responses to Chronicle questions over many months of stories about B606, most of which do not appear in the coverage. This is unfair to readers, to the B606 employees and to the agencies involved. Here is an annotated version of the most recent story, to point out these areas of omission, opinion or inaccuracy. The fact is, there is no evidence that the workers in Building 606 are not safe. We continue to work with them, and if there were a problem, now or in the future, we would look into it because their health and safety is our top priority.*

*Attached is the answers DPH provided for this story.*

San Francisco Chronicle

New questions about SF safety tests at Hunters Point shipyard building

[Jason Fagone](#) and [Cynthia Dizikes](#) Dec. 20, 2018 Updated: Dec. 20, 2018 8:46 a.m.

City employees who work at an unusual building deep inside a San Francisco Superfund site have been waiting for years to know if their surroundings are safe. But recent tests by the city health department won't provide much comfort.

The structure at the former Hunters Point Naval Shipyard, which has housed police employees since 1997 and contains the citywide crime lab, is known as Building 606. In July, after The Chronicle revealed significant health hazards there — and years of failed oversight by government agencies — the health department promised the roughly 40 remaining employees that it would test the building's air, soil and tap water for chemicals and radioactive substances known to exist elsewhere at the site.

Since then, however, one of the most crucial tests, a search for radioactivity inside the building and in surrounding soil, has been delayed. It is not scheduled to begin until at least mid-January.

Meanwhile, some tests that have been completed were minimal and poorly designed, independent experts say, raising the possibility that the people who work there are not safe.

"I think we're really taking a risk with their lives," Police Commission member Petra DeJesus said at a Dec. 12 hearing that discussed the testing at Building 606. "I don't understand why we don't really put pressure on the mayor's office and expedite removing them."

One of the newly completed tests was performed on the building's tap water, and another checked a nearby pile of soil. The water-quality test discovered an elevated level of lead in one sample and did not detect many other potential contaminants.

Due to concerns about the water's safety — past test results discovered troubling levels of lead, petroleum byproducts and other contaminants in the tap water — the Police Department has been providing bottled water to building occupants for two decades.

A sample from the soil pile contained radioactive substances at levels below the Navy's cleanup targets at the former shipyard, but above the default safety goals for Superfund sites set by the U.S. Environmental Protection Agency.

**Commented [RK1]:** Inaccurate. The Building was transferred to the city by the Navy as suitable for lease many years ago, under a strict federal and state regulatory process. The DPH and SFPD have worked together ever since the SFPD started using the building to respond to employee concerns and conduct tests as needed.

**Commented [RK2]:** That is an opinion, not a fact, and it is not attributed.

**Commented [RK3]:** We have provided an update on the status of all of those tests to the Chronicle, and they have omitted mention of several including air and dust.

**Commented [RK4]:** That is an opinion, not a fact. There is no history of radiation connected to the building, so one might also argue that the other tests, of building conditions, are more crucial.

**Commented [RK5]:** It is fine to question the tests, of course. However, there is no explanation provided of how differing standards or interpretations might be applied, only questions. The story also provides no mention of the tests that are not being questioned, and there is no conclusion presented by anyone that the workers are not safe. This seems to be a decision by the reporters — that the workers are unsafe —, and they are not including any information that does not support that narrative.

**Commented [RK6]:** The reporters omit the clarification that the soil was analyzed for disposal, has been accepted by the landfill, and will be removed.

The city's health and police departments both said the testing that has been done should reassure employees and that no workers need to be relocated.

In testimony to the Police Commission, Deputy Police Chief Robert Moser said he saw no test results that required "any immediate action" to protect people in the building. The Department of Public Health said in a statement that the tests to date have been adequate and are part of ongoing checks that will continue next year, in collaboration with the Police Department and other agencies.

"The testing of the building continues to affirm that there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup," said health department spokeswoman Rachael Kagan.

This argument is one that the city has been repeating for 20 years, assuring police employees that they shouldn't worry about working at the building. It's what employees were told even when a toxic waste dump 2,000 feet away caught on fire in 2000 and spewed smoke for days. And they heard it again when the Navy hauled thousands of truckloads of contaminated soil and dumped them next to the building in 2007, releasing potentially radioactive dust particles into the air.

Radioactivity has been the dominant concern at the site since dozens of radioactive ships were hauled back to the shipyard in 1946 after nuclear tests in the Pacific. The area also was the site of federal nuclear labs that further spread toxic elements throughout buildings and the soil.

When the city promised to do more testing this year, potential exposure to radioactivity was again a significant concern of the building's employees. The health department told occupants in July that it would perform a comprehensive search for radioactive hazards indoors and outdoors — in the air filters, in the crawl space beneath the building and in the soil and parking areas around it.

But five months later, that search has not begun — a delay that DeJesus found troubling.

"Why would we delay testing?" DeJesus said last week. "Why wasn't that done first?"

City officials cited "contractual issues" with the person being hired to perform the search. He is a health physicist, a person trained in the effects and properties of radioactive materials. The city doesn't have a health physicist on staff.

So far, only a very limited radiation scan has been performed at Building 606, confined to a single pile of soil that has been sitting next to the building for months awaiting disposal.

The soil was excavated to install a new sewer tank next to the building. A contractor hired by the health department took only one sample of the soil pile to test for radioactive substances. Although the levels measured were below the Navy's cleanup standards for the former shipyard, those standards are based on science that is now obsolete. Compared with the EPA's current default goals for soil at Superfund sites, the quantities of radioactive uranium-235 and cobalt-60 found in the pile are four times higher than what the federal government aims for in residential areas.

"They should have taken many samples," said Daniel Hirsch, an independent watchdog of environmental cleanups and the former chair of environmental and nuclear policy at UC Santa Cruz. "Why would one take only a single data point if one wanted to determine safety?" he asked, and why not compare it to the EPA's current safety limits.

**Commented [RK7]:** We did not limit our involvement to next year, but said it is part of our ongoing commitment — both before this current round of tests and into the future.

**Commented [RK8]:** That assurance is based on evidence.

**Commented [RK9]:** Here the reporters omit the history of Building 606 in relation to the overall shipyard, even though they were reminded of that as part of DPH responses for this story: "Remember, Building 606 is not part of the Navy's cleanup and restoration of the Hunters Point Shipyard. It was built in 1989, long after the radiological activities at the Shipyard had concluded. Construction of Building 606 entailed the excavation of soil down to 5.5 feet below the building, placing of a foundation, and constructing a brand new building on top." Not including that history is a disservice to readers and omits important information they could use to make up their own minds about the situation.

**Commented [RK10]:** The air filters have been tested, and that is omitted from the story.

**Commented [RK11]:** False. The sample was a composite drawn from 4 sites. This answer was provided to the Chronicle on 12/19 and it also appears in the test results they reviewed.

**Commented [RK12]:** It would help the reader to understand that the soil was being evaluated for disposal. The employees of B606 have no exposure to the soil, and therefore no risk. The soil has been accepted at landfill and will be removed.



Similarly, a recent test of the tap water at Building 606 raises as many questions as it answers.

According to data from the San Francisco Public Utilities Commission, whose water-quality laboratory tested the samples, the amount of lead in one sample was 31 parts per billion, about twice the regulatory “action” level of 15 parts per billion.

If a city finds lead above this level, the EPA says, it should take steps to reduce it. But lower levels of lead may still cause health problems. Another sample taken recently at Building 606 contained lead at 11 parts per billion. The presence of lead suggests that there may be corrosion in the building’s pipes.

Other types of contaminants weren’t detected at all in Building 606’s water, including volatile organic compounds and pesticides.

However, given the limited testing done, these results may not mean much, experts said.

The Public Health Department tested the water from only two locations inside the building and two locations outside — and took only one sample from each location. The building contains other taps that weren’t tested.

“Ideally, you would measure every tap, because they all could be different,” said Kara Nelson, professor of civil and environmental engineering at UC Berkeley and an expert on urban water supplies. “And then you’d do two sets of samples at least. ... It’s not recommended ever to put that much weight on a single sample. Weird things can happen with single samples.”

Past tests done by the health department were more rigorous. Twenty years ago, industrial hygienists directed a program of water monitoring at Building 606, taking seven sets of samples over a 10-month period from 1997 to 1998. Each round of testing analyzed up to 12 samples from as many as four locations within the building. Those tests first established the presence of lead and other contaminants in the building’s water.

Andrew DeGraca, director of the water quality division at the San Francisco Public Utilities Commission, told The Chronicle that if the health department wanted “a higher level of certainty” that Building 606’s water is now safe, “obviously you’d go to every single tap in the building” and run tests.

He said officials might also perform what’s known as a “10-bottle test,” a procedure that involves filling 10 one-liter bottles with tap water from multiple locations and using the samples to trace the source of corrosion products. The PUC often uses the 10-bottle test when it analyzes water in San Francisco schools when lead levels are above 50 parts per billion.

Asked why more rigorous tests weren’t performed at Building 606, DeGraca said the PUC was following the lead of the health department, which designed the testing plan and didn’t ask for an opinion about the results — or any corrective actions.

“We weren’t looking at the data and analyzing that,” he said. “That was not something we were asked to do.”

The health department has said that thoroughly running the water in Building 606 should eliminate any lead concerns, and there is also a plan to install water filters in the building. Bottled water will continue to be provided to Building 606 employees.

**Commented [RK13]:** Correct. DPH and SFPD presented this information to B606 employees and discussed it with them.

**Commented [RK14]:** It may also be attributed to leaching of lead from the pipes, which is not corrosion. This was explained to the Chronicle.

**Commented [RK15]:** The water safety testing plan was developed with DPH and PUC. Both agencies answered why two taps were tested inside the building, and the answers do not appear in the story.

**Commented [RK16]:** This is a misrepresentation of the collaboration between the agencies. Both PUC and DPH sent the Chronicle statements underscoring that the work was done together, in part because of concern after the interview w DeGraca that the Chronicle was seeking to portray a conflict or division between the two agencies, which does not exist. Those statements of collaboration were ignored.

In the past, the Public Health Department misled police and the public about the water at Building 606, downplaying problems and misrepresenting test results.

**Commented [RK17]:** That is an accusation with no foundation.

For instance, in 2007, a top official at the health agency, Vickie Wells, wrote an email to a police captain telling him that Building 606 occupants shouldn't drink the tap water. She gave two reasons why it might be unsafe. Because the police were one of the few tenants at Hunters Point, she wrote, the water volume running through the shipyard's pipes was low, possibly leading to "water sitting in pipes for prolonged periods of time, which could result in water quality issues." She also pointed out that previous tests of Building 606's water had shown contamination with hydrocarbon compounds and lead.

**Commented [RK18]:** This email exchange was questioned by the Chronicle for an earlier story and was explained. Yet, they continue to misrepresent it. Also, it has nothing to do with the testing done in 2018.

"I would strongly recommend that bottled drinking water be retained for Bldg 606 at Hunters Point," Wells concluded in the email to the captain.

Three years later, though, she denied ever saying that.

"We never recommended bottled water," Wells wrote in a 2010 email to health department colleagues.

Wells has since retired.

Health department spokeswoman Kagan said there was no contradiction between the two emails. The 2010 email "restates what was written" in the 2007 email, she said.

"The safety of the building," she said, "has been reaffirmed each time."

## DPH RESPONSES TO CHRONICLE RE B606 TESTS – Dec 2018

In chrono order – most recent on top.

12/18/18 inquiry from Chronicle

Hi Rachael. Here are some questions for a story we're writing about Building 606 testing process and results.

Given our deadline, we need responses by **noon tomorrow** (Wednesday):

-- It looks like there were only two water samples taken inside Building 606, total -- one in each of two locations. This is what PUC told us when we asked them. Why so few samples, in so few locations? Building 606 is a 90,000-square-foot building with many other water taps that were not tested. In 1997 and 1998, industrial hygienist Ed Ochi regularly gathered water quality data from as many as five different locations within the building, and took multiple samples from those locations: 7 samples in June 1997, four samples in July 1997, 21 samples in August 1997, 12 samples in September 1997, 12 samples in October 1997, and so on. Why was the water testing so much more comprehensive in 1997, and so minimal today?

-- An expert from the Berkeley Water Center told us that it's very difficult to draw conclusions about the safety of water from so few samples. Ideally, she said, every tap in the building would be tested multiple times, on multiple days. It's not good practice to draw conclusions from so few samples. Why does SFDPH think that this minimal water testing is adequate to draw conclusions about the safety of the water?

-- Why was the test so minimal? Which personnel at the health department designed this water test, and what was the purpose of only taking two samples inside the building?

-- We spoke with Andrew DeGraca in the PUC's water quality division. He said that the health department didn't ask PUC for an analysis of the lab data on these samples: "We weren't looking at the data and analyzing that. That was not something we were asked to do." Why didn't the health department ask the city's water quality experts for their analysis?

-- DeGraca said that if the health department wanted "a higher level of certainty" that the building's water was safe, "obviously you'd go to every single tap in the building" and test the taps. You might also do a "10-bottle test," as is done in some SF schools when water is tested. Why weren't these more extensive tests performed?



-- Why weren't the hot water taps tested? In 1997 and 1998, some of the most elevated levels of contaminants (lead, TEPH) were measured from the building's hot water taps. Why wouldn't the health department want the hot water tested as well?

-- Was the water tested for TEPH (Total Extractable Petroleum Hydrocarbons)? If not, why not? Ochi found TEPH in the water when he was doing the monitoring.

-- High levels of lead and aluminum were found in Building 606's pipes. Does this raise concerns about possible corrosion in the pipes? Can the health department provide some kind of comprehensive analysis to show that lead levels aren't high in the taps that weren't tested?

-- From the EERG/TestAmerica report on the rad testing of the soil pile, it appears that only one soil sample was taken from the pile (sample ID 720-88635-1, pages 7 and 8). The sample summary on page 16 also lists only one sample with the same ID number. Is this correct? How many samples were taken from the pile, and where were they taken from? And if only one sample was taken, how can the health department draw any conclusions about the safety of that soil? Experts tell us that one sample is not enough to draw sound, scientific conclusions.

-- It also appears that outdated health standards were used by the health department to interpret the rad results of the sample from the soil pile. It's true that the rad levels are below the Navy's cleanup standards for Hunters Point, but as we and independent experts have pointed out in the past, these standards are based on obsolete science. Compared with the current default residential EPA PRGs for soil at Superfund sites, the measured levels of Uranium-235 and Cobalt-60 in the pile are four times higher than what the EPA considers acceptable. Why does the health department consider these levels acceptable? (We feel that residential limits are a fair basis for comparison given the planned future use of the site and the fact that police who train outdoors in an active remediation area have additional potential exposures that are not accounted for in the models — see our story on Building 606 and RSY2 for an example.)

-- What were the minimum detection limits of the equipment used to test the soil pile? The report lists DLCs, "Decision Level Concentration," but these are usually higher than minimum detectable levels. It appears that the test wasn't sensitive enough to detect concentrations of radionuclides in the soil at levels required by the EPA's default PRGs.

-- According to testimony at the December 12 Police Commission hearing, the health department agreed in July that Building 606 and surrounding areas should be tested for radionuclides, but the tests have still not been performed and are now scheduled for January. Commissioner Petra DeJesus asked, "Why would we delay the radiological testing until January? Why wasn't that done first?" DeJesus also said, "I think we're really taking a risk with their lives. I don't understand why we don't really put pressure on the mayor's office and expedite removing them." What is your response to this? Why have these tests deemed necessary by SFDPH been delayed until January? And shouldn't the 40 employees currently working at the building be moved to another location until these pending radiological tests can confirm their safety? Why does the department think it's safe to keep 40 city employees at the building given this uncertainty and the delay in the tests? Is the health department "taking a risk with their lives"?

-- Given the apparent inadequacy of the water and radionuclide tests that have been performed to date, how can the health department say that "there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup"?

Thanks

Jason and Cynthia

12/19/18 DPH response to SF Chronicle

1. Here is the response to the questions about water testing:

SFDPH Occupational Safety and Health (OSH), SFDPH Environmental Health, SFPD and SFPUC worked collaboratively in the development of a comprehensive Building 606 drinking water sampling and analysis plan. Sampling locations were selected to characterize and compare drinking water quality and chemistry inside Building 606 and the SFPUC distribution system outside the building. Collecting samples at the entrance to the building and at the furthest tap effectively characterizes the water in the whole building as it confirms whether there is any change in water quality.

Drinking water was sampled at the kitchenette faucet which is located at terminal end of Building 606 water supply and where water is most likely collect and stagnate. Our sampling did not include hot water or boilers because this water is not ingested. Water from boilers and hot water heaters can collect metals from the materials of the tanks. This is expected, and would not usually indicate anything actionable.

Water samples were analyzed for a wide variety of water chemistry parameters and potential contaminants including heavy metals, pesticides, herbicides, volatile organic compounds, radiological compounds, disinfection products and total extractable petroleum hydrocarbons (see page 3 of the results, and look for "SUB\_8015M(EPA 8015) TPH DRO").

The test results were reviewed and discussed collaboratively among staff from DPH Environmental Health, DPH OSH, and PUC Water Quality Division. Together staff determined that the results were benign for all parameters except for lead in one location.

Lead was detected in the men's shower room sink faucet above the federal Action Level of 15 ppb. Since elevated lead was not detected in sample outside building the lead source is within Building 606 fixtures and pipes. The detection of lead in the water samples is indeed indicative of leaching from the pipes (not necessarily corrosion – leaching can occur just from water sitting in a pipe overnight). SFPUC, SFDPH and SFPD are continuing to work together on water quality issues which will include future monitoring.

2. Here is the response to questions about soil testing:

The chain of custody attached to the Test America analytical report states: "One sample was collected from a 4 point composite."

This sample was collected to characterize the soil for disposal.

Although the soil was analyzed for disposal, the additional radionuclides testing was done to learn more about the soil pile, and the findings are that the radionuclides are below the release criteria for the Shipyard cleanup. There is no exposure or risk to Building 606 employees from the soil pile, and it will be removed shortly.

Information about the equipment used by the laboratory to analyze the samples is in the report from Test America.

3. Here is the response to the last two questions:

There is no risk to the health and safety of employees at Building 606. The radiological testing will be conducted by an independent expert. The timeline was not as fast as we would have liked, but that does not mean that employees are endangered. Building 606 was found suitable for lease many years ago, under the conditions of a strict federal and state regulatory process. Remember, Building 606 is not part of the Navy's cleanup and restoration of the Hunters Point Shipyard. It was built in 1989, long after the radiological activities at the Shipyard had concluded. Construction of Building 606 entailed the excavation of soil down to 5.5 feet below the building, placing of a foundation, and constructing a brand new building on top.

The Police Department does have a longstanding plan to relocate the operations and employees currently at Building 606. Please check with them for more information about that.

The health and safety tests were adequate, and are part of our ongoing attention to the building. The results were shared and discussed with the employees of Building 606, who are the focus of our attention. Their health and safety is our top priority. The testing of the building continues to affirm that there is no evidence of health hazards in Building 606 related to the Hunters Point Naval Shipyard cleanup. We will continue to work with the Building 606 employees and respond to any concerns, in collaboration with the San Francisco Police Department and other relevant agencies.

12/19/18 – response from PUC to Chronicle

The SFPUC was asked to provide drinking water monitoring support by the San Francisco Department of Public Health (SFPDH) at Building 606. Based on a review of sample results from the previous 15 rounds of monitoring between 1993 and 2018, and the findings from a joint site visit with SFPDH and San Francisco Police Department representatives, a draft plan was prepared by SFPUC, which SFPDH edited and approved.

The sampling goal was to provide a cost-effective, representative picture of the quality of drinking water entering the building and within the building at water taps agreed by SFPDH and SFPD. The objective was to obtain the quality of the water for drinking by the occupants of Building 606. Water not recommended for drinking, such as boiler feed, showers and hot water was excluded from sampling.

The initial results show that the water quality of the facility met State and Federal drinking water standards, with the exception of a lead result above the Action Level at one tap, which we recommended mitigating through flushing, fixture replacement, or filters. Based on the initial results, a follow-up monitoring plan will be developed in collaboration with the SFPDH.

Questions:

- Can you confirm that only 1 water sample was taken and tested from each of two locations inside Building 606 -- i.e., the total number of samples from inside the building tested by PUC was 2? And similarly, that 1 sample was taken from each of 2 outdoor locations? For a total of 4 samples both indoors and outdoors?
  - Yes. There were two total from within Building 606, and two total from outside of Building 606.
- Were any of the samples tested for TEPH, Total Extractable Petroleum Hydrocarbons (which were an issue in the 1997 water tests of Building 606)?
  - Per the sampling plan, total extractable petroleum hydrocarbon was analyzed for all four samples collected for Building 606 monitoring. The TPH diesel range organics results were below the detection limit of 0.05 mg/L (shown as TPH DRO analysis on page 3 of each report) at all 4 locations.
- How much did these lab tests cost, total, and who paid for them?
  - The laboratory test cost is \$7,900 for the 3 samples collected on the property of Building 606. Sample collection and handling was an additional \$1,100. The San Francisco Police Department will ultimately be responsible for reimbursing the SFPUC for this cost.

*12/14/18 DPH response to Chronicle*

*Here is the report and answers to your questions. Also, an overview on the progress of Building 606 testing.*

*We are glad for the opportunity to work closely with the SFPD and their employees to respond to their concerns. It is very important that the people who work at Building 606 every day know that they can ask questions and get responses. Most important, of course, is that they are safe and feel safe.*

*At this point, all of the testing done to date confirm that there is no evidence of health hazards at Building 606 related to the Shipyard cleanup and restoration. It's good to see the test results come back so consistently. They affirm that the police employees are not at risk at the Shipyard. We will continue to work with the SFPD and Building 606 employees on any questions or concerns they have.*

*To summarize, the air, dust, water and soil testing agreed to in July are done. Highlights include:*

- *Settled dust tested in warehouse found no asbestos or lead*



- *Testing of the soil pile near the building found all radionuclides below the release criteria for the Shipyard cleanup set by the EPA*
- *The soil was tested for disposal, has been accepted by the landfill and will be removed*
- *The potable water testing found no radionuclides, pesticides, semi-volatile or volatile organic compounds*
- *Of two indoor faucets tested, lead was found in both. In one, in the shower room, the levels were above the federal action level. In the other, at a kitchenette sink, the levels were below. We are working with PUC on continued monitoring and testing. This is believed to be caused by the building's pipes, and not from the exterior water source. Meanwhile, staff are instructed to flush the water before drinking it, water filters are being added to the three sinks in the building, and bottled water will continue to be provided. The water is safe for showering, hand washing and dish washing.*
- *Air quality was previously tested and reported in September, with no findings of lead or asbestos.*

*What remains to be done:*

- *Testing of standing water in the crawl space – to be done when there is standing water*
- *Radiological health & safety screening of the interior and exterior of the building – expected in mid-January*
- *Continued potable water monitoring and evaluation*
- *Periodic indoor air monitoring*
- *Ongoing communication and information to B606 employees regarding Navy Shipyard*

Are the radionuclide levels included in this report? The PowerPoint you sent us mentions that "All radionuclide parameters were found to be below release criteria set by Navy, EPA, & CDPH" in the soil pile, but I don't see radionuclides in the EERG report. I see tests for VOCs, metals, PCBs, etc., but not radionuclides. I could be missing something?

*The radionuclides were analyzed in a separate report, which is attached. Although the soil was analyzed for disposal, the additional radionuclides testing was done to learn more about the soil pile, and the findings are that the radionuclides are below the release criteria for the Shipyard cleanup. There is no exposure or risk to Building 606 employees from the soil pile, and it will be removed shortly.*

Also, can you tell us exactly which health-based standards you are applying to all of these test results -- air, soil, radionuclide, and water? The health-based standards don't appear to be listed in the reports.

*In each case these elements were tested and not found to be at levels to cause public health concern, therefore there is no health risk to the employees at Building 606. The summary above and the slides presented on Dec 10 provide information on how each element was considered.*

Additionally, I've been looking at the PUC water test results for 606 and it appears that in some samples there are levels of certain analytes in the water above the EPA and state Maximum Contaminant Levels, including arsenic and a number of VOCs. What does the health department

mean on page 9 of the PowerPoint where it says "Not Detected: Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Radionuclides, and Pesticides"? From the results column, it appears that some analytes that aren't found in normal San Francisco PUC water are not only detected in the Building 606 water (i.e. there's a measured level above the detection limit that is given in the report) but the levels in some cases are above federal and state MCLs.

*We reviewed all the PUC data and there were no exceedances within the Shipyard or Building 606 sources. The only lab report that showed any exceedances of the MCL (>MCL) was the report labeled FEBCO, which is the main SFPUC supply on Crisp Road that provides pre-filtered water to HPS/Bldg. 606. Those exceedances were: Iron (Fe), Aluminum, (Al), Manganese, (Mn). Those levels did not appear again in the Shipyard or Building 606 locations tested.*

*Lead (Pb) was detected in one sample inside Bldg. 606 at 31ug/L (31 ppb), in the men's first floor shower room, which is above the Action Level of 15 ppb. At the second floor kitchen sink lead was detected at 11ug/L (11 ppb), which is below the action level.*

The Powerpoint says, "Lead was detected below the Action Level in the 2nd floor kitchen," but in the report titled "PoliceCommission121218-BLDG6062ndFLRm201kitchen.pdf," which I assume is the results for the second floor kitchen, there are two samples with lead readings **above** the 15 ppb action level -- one lead level is 31 ppb and the other is 34 ppb.

*This confusion appears to be from your mis-reading of the lab results. Both the 31 ppb and the 34 ppb levels you reference are part of the lab's quality control and not actual readings from the building itself.*

*If you look at the key on page 14, those are labeled LCS and SPK – which are laboratory controlled samples and not readings from the building sample. The lead reading on page 1 is the actual finding from the building itself. Pages 1-3 represent the actual sample data from the location and the remaining pages are the quality control standards and not sample results.*

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]

**Sent:** Friday, December 14, 2018 9:13 AM

**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>

**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>

**Subject:** Re: report on 606 tests?

Can you send us the EERG radionuclide results today? Thanks.

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**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 5:18 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

Can you add another question to the hygienists?

The Powerpoint says, "Lead was detected below the Action Level in the 2<sup>nd</sup> floor kitchen," but in the report titled "PoliceCommission121218-BLDG6062ndFLRm201kitchen.pdf," which I assume is the results for the second floor kitchen, there are two samples with lead readings **above** the 15 ppb action level -- one lead level is 31 ppb and the other is 34 ppb.

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**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 4:04 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

Ok, thanks.

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 4:03 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

I will follow up with the industrial hygienists on these questions. I don't have that level of detail myself.

Thanks,  
Rachael

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**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Thursday, December 13, 2018 3:37 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Thanks. Are the radionuclide levels included in this report? The PowerPoint you sent us mentions that "All radionuclide parameters were found to be below release criteria set by Navy, EPA, & CDPH" in the soil pile, but I don't see radionuclides in the EERG report. I see tests for VOCs, metals, PCBs, etc., but not radionuclides. I could be missing something?

Also, can you tell us exactly which health-based standards you are applying to all of these test results -- air, soil, radionuclide, and water? The health-based standards don't appear to be listed in the reports.

Additionally, I've been looking at the PUC water test results for 606 and it appears that in some samples there are levels of certain analytes in the water above the EPA and state Maximum Contaminant Levels, including arsenic and a number of VOCs. What does the health department mean on page 9 of the PowerPoint where it says "Not Detected: Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Radionuclides, and Pesticides"? From the results column, it appears that some analytes that aren't found in normal San Francisco PUC water are not only detected in the Building 606 water (i.e. there's a measured level above the detection limit that is given in the report) but the levels in some cases are above federal and state MCLs.

thanks,  
Jason

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 3:07 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

[https://www.sfdph.org/dph/files/newsMediadocs/2018PR/HPNS\\_Crime\\_Lab\\_Analytical\\_Results.pdf](https://www.sfdph.org/dph/files/newsMediadocs/2018PR/HPNS_Crime_Lab_Analytical_Results.pdf)

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Thursday, December 13, 2018 2:13 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Rachael, can you send us the EERG report / results on the soil pile? It doesn't appear to have been included in the documents posted on the police commission site. Thanks.

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**From:** Fagone, Jason  
**Sent:** Thursday, December 13, 2018 1:50 PM  
**To:** Kagan, Rachael (DPH)  
**Cc:** Dizikes, Cynthia  
**Subject:** Re: report on 606 tests?

got it, thanks

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Thursday, December 13, 2018 1:18 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?



**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Wednesday, December 12, 2018 1:15 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** Re: report on 606 tests?

Thanks.

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**From:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Sent:** Wednesday, December 12, 2018 1:10:12 PM  
**To:** Fagone, Jason  
**Cc:** Dizikes, Cynthia  
**Subject:** RE: report on 606 tests?

We don't have a formal report, but I can send you the latest B606 update tomorrow morning. There will be a full report when all testing is completed.

Thanks,  
Rachael

**From:** Fagone, Jason [<mailto:Jason.Fagone@sfchronicle.com>]  
**Sent:** Tuesday, December 11, 2018 12:25 PM  
**To:** Kagan, Rachael (DPH) <[rachael.kagan@sfdph.org](mailto:rachael.kagan@sfdph.org)>  
**Cc:** Dizikes, Cynthia <[CDizikes@sfchronicle.com](mailto:CDizikes@sfchronicle.com)>  
**Subject:** report on 606 tests?

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Rachael. We heard that the health department is issuing its report on recent tests at Building 606. When will this be released, and can you send us the document? Thanks.

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Jason Fagone  
Reporter, San Francisco Chronicle  
[jason.fagone@sfchronicle.com](mailto:jason.fagone@sfchronicle.com)  
office phone: 415-777-6018